



2026-2027 Action Plan [draft]

Wade Kapszukiewicz, Mayor
Rosalyn Clemens, Director

One Government Center
Suite 1800
Toledo, Ohio 43604
phone 419-245-1400
fax 419-245-1192

➔ toledo.oh.gov

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Executive Summary

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

The City of Toledo (COT), as an entitlement city and participating jurisdiction, receives annual funding from the U.S. Department of Housing and Urban Development (HUD) through the Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Solutions Grant (ESG) programs. These federal resources help support programs and services that benefit low- and moderate-income residents by improving access to safe, decent, and affordable housing, expanding economic opportunities, and strengthening Toledo's neighborhoods.

Program Year (PY) 2026 (52nd), beginning July 1, 2026, marks the second year of the City's 2025-2029 Five-Year Consolidated Plan. The PY 2026 Annual Action Plan outlines how the City plans to use its HUD entitlement funds during the program year to address housing and community development needs.

The activities included in this plan are aligned with the priority needs and goals identified in the 2025–2029 Five-Year Consolidated Plan. These priorities were developed through a planning process that included reviewing housing and community development data, citizen participation, and consulting with stakeholders, community organizations, and service providers.

The funding amounts shown for PY 2026 are estimated based on projected HUD allocations. Once final allocation amounts are received, all proposed activity budgets will be proportionally increased or decreased from the estimated funding levels to match actual allocation amounts.

- Community Development Block Grant (CDBG): \$7,046,960.00
- HOME Investment Partnerships Program (HOME): \$1,965,724.17
- Emergency Solutions Grant (ESG): \$627,043.00

Program Income

Program Income (PI) is the gross income received that was directly generated from the use of CDBG, HOME, and Neighborhood Stabilization Program (NSP) funds.

The estimated program income is listed below:

- CDBG Program Income (Estimated Amount): \$900.00
- HOME Program Income: \$200,000.00
- NSP1, 2, and 3 Program Income: \$0.00

CDBG, HOME, and ESG are annual federal allocations. PI from CDBG, HOME, and NSP are annual projections. The allocations are available to be utilized toward meeting HUD's National Objective.

Carryover Funds

Carryover funds that may be available to support activities during Program Year (PY) 2026 are listed below. The estimated amounts of carryforward funds entering the second year of the Five-Year Consolidated Plan are subject to reconciliation of accounts and the processing of outstanding payments to determine final

balances. As a result, the amounts listed below are estimates and may be adjusted once final figures are confirmed.

- CDBG Carryover: \$1,894,000
- HOME Carryover: \$5,024,000
- ESG Carryover: \$0.00

In accordance with HUD guidelines, the COT will allocate at least 70% of its CDBG entitlement funds to activities that directly benefit low- and moderate-income (LMI) persons, including individuals with disabilities and other eligible residents of the City. In addition, the COT will reserve no less than fifteen percent (15%) of its HOME allocation for Community Housing Development Organizations (CHDOs) that are certified and recognized by the Department of Housing and Community Development (DHCD).

To support the priority needs and goals outlined in the 2025–2029 Five-Year Consolidated Plan, the COT will allocate funds toward both operational and programmatic activities in the following areas:

- Planning and Administration (Operational/Program) – CDBG, HOME, and ESG
- Housing and Neighborhood Revitalization (Operational/Program) – CDBG, HOME, and NSP
- Economic Development (Operational/Program) – CDBG
- Fair Housing Services (Operational/Support) – CDBG
- Non-Housing Community Development Needs (Program/Activity) – CDBG
- Homelessness (Operational/Program) – ESG
- Lead Hazard Control (Operational/Program) – LEAD

2. Summarize the objectives and outcomes identified in the Plan

The goals and priorities identified in the City of Toledo’s 2025-2029 Five-Year Consolidated Plan were developed through community input gathered during the citizen participation process. These priorities focus on improving housing conditions, supporting neighborhood revitalization, strengthening community development efforts, and expanding economic opportunities for residents.

To achieve these goals, the City will work collaboratively with non-profit organizations, for-profit businesses, other City departments, and local and regional partners committed to improving the lives of Toledo residents and neighborhoods. A key focus will be on increasing access to safe, decent, and affordable housing. In addition, public service activities that address basic community needs will be implemented through DHCD’s third-party partners or other non-profit organizations. Consistent with HUD regulations at 24 CFR Part 5, the majority of individuals benefitting from the programs and services will be low- to moderate-income residents.

Through the 2025-2029 Five-Year Consolidated Plan, the COT established local priorities that align with HUD’s National Objectives. The City will continue to focus on initiatives and activities that address two of the three HUD National Objectives:

- Benefit to low- and moderate-income (LMI) persons
- Aid in the prevention or elimination of slum and blight.

A summary of the goals and objectives for Program Year (PY) 2026 (52nd) is provided in section AP-20 Annual Goals and Objectives of the Annual Action Plan. Each goal aligns with HUD’s established objectives and outcomes framework. All current and future activities supported through the Five-Year Consolidated Plan and the Annual Action Plan will contribute at least one HUD Objective and one measurable outcome.

HUD Objectives:

- Suitable Living Environment – promote healthy communities by improving the well-being of low- to moderate-income residents through programs and services that address basic needs and support progress toward self-sufficiency.
- Decent Housing - ensure access to safe, healthy, and affordable housing for low- to moderate-income households while advancing fair housing and addressing housing discrimination.
- Economic Opportunity – expand economic opportunities and support job creation within the community.

HUD Outcomes:

Outcomes measure how funded activities or programs will benefit a community or the resident served. The City will use the following outcomes to evaluate the impact of activities through this plan:

- Improve Availability/Accessibility
- Improve Affordability
- Improve Sustainability

In addition, the goals and actions outlined in this plan will support the City’s commitment to Affirmatively Further Fair Housing (AFFH). These efforts will be guided by the recommendations identified in the Fair Housing Center (TFHC) City of Toledo Analysis of Impediments to Fair Housing Choice for the period July 1, 2025 - June 30, 2030.

3. Evaluation of past performance

As a CDBG entitlement city and a HOME participating jurisdiction, Toledo receives direct HUD funding for the following federal programs:

- Community Development Block Grant (CDBG)
- HOME Investment Partnerships (HOME)
- Emergency Solutions Grant (ESG)

Each year, the City evaluates the progress of projects outlined in its Annual Action Plan through the Consolidated Annual Performance and Evaluation Report (CAPER), which is available on the city’s website. The CAPER summarizes the accomplishments and progress toward the Consolidated Plan goals for each year.

Toledo effectively administered its HUD-funded programs, achieving its annual outcomes consistently. The 2024 Program Year (July 1, 2024–June 30, 2025) marked Year 5 of the City’s 2020–2024 Five-Year

Consolidated Plan. Projects funded aligned with priority goals focused on neighborhood revitalization, economic growth, and community development, despite ongoing pandemic-related challenges.

CARES Act Response and COVID-19 Recovery

Toledo received \$5.98M in CDBG-CV and \$4.88M in ESG-CV funds to prevent, prepare for, and respond to COVID-19. The ESG-CV funds have been fully expended, while \$5.6M of CDBG-CV has been spent. Key accomplishments include:

Using CDBG-CV Funds:

- 274 businesses assisted
- 595 households received emergency rental aid
- 11,596 people received COVID testing
- 5,570 individuals received supplies/cleaning support
- 35,515 people supported with food security
- 1,575 people assisted (13 youth, 1,482 seniors, 80 homeless)
- 91 people supported with legal/eviction aid
- 62 households received mortgage assistance

Using ESG-CV Funds:

- 406 households received emergency rental assistance
- 587 people benefitted from laundry equipment access
- 365 people received street outreach
- 35,238 people served via the Continuum of Care (CoC) Collaborative
- A partnership with Toledo Public Schools (TPS), TLCHB, and Lutheran Social Services helped stabilize housing for 217 families of TPS students.

Homeownership Assistance Program

Through HOME funds, 58 first-time homebuyers received assistance and completed HUD-certified homeownership training. DHCD and partners also continued efforts in housing rehabilitation, lead hazard control, and homelessness prevention.

Community Gardens & Neighborhood Improvement

Programs supporting community gardens reached 3,704 individuals, helping reduce blight, increase food access, and promote neighborhood engagement.

Fair Housing

Toledo supports the Fair Housing Center, which received over 2,000 intakes, investigated more than 125 cases, and impacted over 8,000 individuals through its efforts. The Center also delivered over 25 outreach and training sessions, with funding from both HUD and the City's CDBG allocation.

Neighborhood Revitalization Strategy Areas (NRSAs)

In February 2023, the U.S. Department of Housing and Urban Development (HUD) approved the Old South End and Englewood Neighborhood Revitalization Strategy Areas (NRSAs) for the City of Toledo Department of Housing and Community Development (DHCD). For Program Year 2024, HUD further approved the Junction Choice Neighborhood Plan, establishing Junction as the City's third NRSA.

In addition, DHCD designated three neighborhoods in East Toledo - Garfield, Raymer, and Starr as target areas for concentrated investment. The following activities and investments represent DHCD and partner agency efforts in the three NRSAs and the East Toledo target areas during the reporting period.

Reporting period - July 1, 2024-June 30, 2025:

Home At Last (HAL) Down Payment Assistance (DPA)

- Junction - \$15,000 provided to 2 households.
 - Old South End - \$9,336.41 provided to 1 household.
- Total Investment - \$38,336.41 in HAL assistance across all NRSAs and East Toledo target areas.

Roof Replacement Program

- Englewood - 1 completion; \$18,705 (CDBG).
 - Junction - 1 completion; \$21,273 (ARPA).
 - East Toledo Target Areas - 2 completions; total \$33,342 (CDBG: \$20,852 / ARPA: \$12,490).
- Additional Partner Work: Maumee Valley Habitat for Humanity completed rooftop improvements totaling:
- \$91,070.96 in Englewood, East Toledo, and the greater Toledo area.
 - \$55,325.98 in Junction and Old South End.

Lead Paint Abatement

- Total DHCD Investment: \$238,120.46
- Englewood - 2 households completed (\$58,836.98) and 5 scheduled.
 - Old South End - 1 household scheduled.
 - East Toledo - 10 households completed (\$179,283.48) and 22 scheduled.

Demolition & Tree Planting

- Englewood - 6 demolitions; 156 trees planted.
- Junction - 121 demolitions; no trees planted.
- Old South End - 36 demolitions; no trees planted.
- Raymer - 1 demolition; no trees planted.
- Starr - 5 demolitions; no trees planted.

Economic Development - Façade, White Box, and Planning Grants

Total NRSA Investment: \$248,293; Starr Target Area Investment: \$115,000

Breakdown:

- Old South End - 3 businesses; \$99,600 (Façade).
- Englewood - 3 businesses; \$70,000 (Façade, Façade Planning, White Box).

- Junction - 2 businesses; \$78,693 (Façade, White Box).
- Starr (East Toledo) - 2 businesses; \$115,000 (Façade, White Box).

Parks & Recreation Investments

Total Current-Year Investment: \$2,260,299.60 awarded but not yet paid (Englewood & Old South End):
\$844,179.25

Breakdown of current-year projects:

- Junction - \$271,251 Savage Park revitalization.
- Englewood - \$1,088,907.75 Robinson Park shelter/athletic field, and Smith Park pool/athletic field upgrades.
- Old South End - \$520,411.11 for Danny Thomas Park amphitheater & loop trail and Ashley Park playground upgrades.
- East Toledo:
 - o Garfield - \$19,725.18 for Ravine II Park bleacher upgrades.
 - o Starr - \$185,841.40 for Prentice Park playground upgrades.
 - o Raymer - \$174,163.16 for Burnett Park playground upgrades.

Public Service - CDBG-Funded Nonprofit Programs (50th CDBG Year)

Old South End:

- Sofia Quintero Art & Cultural Center (SQACC) - \$74,761.87 for Community Garden Development Initiative, growing and distributing fresh produce to LMI residents and Toledo Seagate Food Bank.
- The Believe Center - \$67,123.06 for Keeping Sports/Skills Alive program (academic tutoring & recreational activities for K–12 youth).
- Toledo Seagate Food Bank - \$55,000 for food baskets to LMI residents and those impacted by opioid dependence.

Englewood:

- Pathway - \$86,724.37 for Emergency Home Repairs for owner-occupied homes of LMI adults aged 62+.

Junction:

- Martin Luther King Kitchen for the Poor - \$61,416.63 for supplemental food box program.
- Art Tatum Zone - \$62,500 for tutoring & summer enrichment programs at Pickett Elementary, Jones Leadership Academy, and Tabernacle Church.
- Lucas Metropolitan Housing - \$9,651.17 for Financial Opportunity Center services for residents of McClinton Nunn, Port Lawrence, and Collingwood Green housing communities.

The City of Toledo’s evaluation of past performance under the Lead-Safe Ordinance has informed the goals, priorities, and implementation strategies reflected in the current plan. Since the ordinance was adopted and implemented, a total of 5,305 Lead-Safe Certificates have been issued citywide. This cumulative certification data, along with compliance trends observed during phased implementation, has provided valuable insight into landlord participation rates, geographic disparities across Census Tracts, inspection workflow challenges, and the effectiveness of targeted outreach and enforcement efforts.

In September 2025, administrative, application review, enforcement, and quality assurance responsibilities transitioned from the Toledo-Lucas County Health Department to the City of Toledo. Since that transition, the Department of Housing and Community Development (DHCD) has evaluated compliance patterns within priority Census Tracts particularly those with the highest incidence of lead-poisoned children and assessed

the impact of the revised phase-in timeline adopted in April 2025. This evaluation demonstrated measurable progress in expanding the supply of certified lead-safe rental units while also identifying the continued need for focused landlord education, strengthened quality assurance procedures, coordinated data sharing, and sustained enforcement in noncompliant areas.

The lessons learned through ordinance implementation and phased enforcement provide the foundation for the City's current objectives, which emphasize targeted outreach, improved compliance rates, enhanced contractor capacity, and long-term reduction of childhood lead exposure in pre-1978 housing.

The City of Toledo Department of Housing and Community Development's Housing Division (DHCD) administers lead-based paint hazard control programs (LBPHC) and is structured to provide easy access and workflow for housing development activities. As such, the DHCD utilizes in-house staff for day-to-day project delivery of unit activities from enrollment through clearance as well as incorporating relationships with subrecipients and partners for outreach, education, capacity training, lead summit development and referral of residential units with active lead hazard control orders. In addition to interim control and abatement activities, the program also provides technical, financial and educational support necessary to reduce lead hazards in very low-, low-, and moderate-income households.

Founded on this structure, the DHCD's grant program will provide technical, financial and educational support necessary to reduce lead hazards to a minimum of 141 low-to-very low-, low-, and moderate-income households over the next four years by targeting a minimum of owner-occupied and rental units with children under the age of six years old. Any pre-1978 residential unit within city limits could be potentially eligible for the program if it meets eligibility requirements. However, targeted marketing and agency engagement will be utilized to generate intakes from the 41 OLHCHH designated high-impact neighborhoods.

The DHCD receives funding to administer dedicated lead-based paint hazard control activities through the Lead-Based Paint Hazard Control Grant program. Funding sources included the HUD Office of Lead Hazard Control and Healthy Homes (OLHCHH), which included both the Lead Hazard Reduction grant as well as the Healthy Homes and Weatherization Coordination Demonstration Grant (HHWCD), the Toledo-Lucas County Regional Health District Cenovus-EPA settlement, the Ohio Department of Development (ODOD) and the Community Development Block Grant for supplemental funding on high-cost units.

During the previous 12 months (beginning in 1/1/2025), the DHCD continued to administer two OLHCHH grants along with two remaining dedicated lead-based paint hazard control funding sources. Aggregate results from the dedicated lead-based paint hazard control activities during the period included 16 additional eligible units enrolled, 101 units having received a comprehensive Lead Inspection/Risk Assessment and 101 units achieving lead clearance (19 owner-occupied and 120 rental). This equates to a total of \$2,525,359.56 investment into the community, assisting 87 occupied households, 59 children under the age of six in providing a lead-safe environment. Additionally, 123 persons between the ages of 6-17 years of age and 116 persons 18 years of age and above were also positively impacted with a lead-safe unit in which to reside, with an average household income of 50.9% AMI.

The DHCD's lead program must still comply with Toledo Municipal Code Section 187.12(d) requiring the successful bidder of a public improvement contract of \$100,000 or greater, which is funded by the City of Toledo or other sources that do not exclude Project Labor Agreements ("PLA"), to enter into a PLA with the Northwest Ohio Building and Construction Trades Council ("NWOBTC"). The bidding documents for each such public improvement or private improvement funded in whole or in part by the City of Toledo shall contain a written provision requiring the successful bidder, and all the bidder's contractors and subcontractors, to comply with and adhere to all of the provisions of the project labor agreement negotiated by the Parties for the project. The City Administration is requiring prevailing wage and/or union labor agreements for the DHCD's current Lead licensed contractors and also for the third-party that would contract with lead-based paint hazard control program. The DHCD continues to develop expeditious ways to respond to the PLA requirements including a full revision of the current policy and procedure model for the LBPHC program.

Strategic Goals and Community Impact

The City has established a \$37 million loan pool for long-term, fixed-rate, affordable financing. Funds will be utilized to close financing gaps, allow borrowers to complete their deals, generate and maintain jobs, increase affordable housing, enhance equity and equitable development prospects, and expand the existing tax base. The City closed on two loans in 2025, each worth \$2 million, for community center improvements and for economic development. A third loan (economic development) will close in spring 2026 for \$616,000.

Toledo was one of 18 communities to receive a HUD PRO Housing Grant Award in 2025 and received \$4,000,000. The grant's activities include a comprehensive zoning rewrite, pre-approved templates for new housing construction, and funding for the NRSA UPLIFT Initiative. DHCD received \$1,600,000 for the program pool and, with the grant award, had pledged to expand the program to all three NRSA's and to increase the overall funding impact to 75 new or preserved homes during the grant performance period (2025-2030).

4. Summary of Citizen Participation Process and consultation process

The City of Toledo's Citizen Participation Plan (CPP) outlines the City's approach to citizen engagement and the consultation process. Public participation is essential in the planning process because it allows residents' perspectives to be considered and ensures that community needs are carefully evaluated when making funding and policy decisions.

In preparing the 2026 (52nd) PY Annual Action Plan, the COT collaborated with several non-profit and community organizations, including Lucas Metropolitan Housing (LMH), The Fair Housing Center (TFHC), the Toledo Lucas County Homelessness Board (TLCHB), and other regional and local partners involved in housing, community, and economic development.

Residents were provided reasonable and timely access to meetings, information, and records related to the COT's proposed use of HUD funds. Public comments on the DRAFT Annual Action Plan will be accepted during a 30-day public comment period beginning Wednesday, March 25, 2026, and ending Thursday, April 24, 2026.

Two public hearings will be held on Thursday, March 26, 2026 and Thursday, April 2, 2026, both beginning at 5:30 p.m. to accommodate residents who may not be available during normal business hours. The public hearings and 30-day comment period were publicized through a public notice, press release, the City's website, and Facebook postings.

The public notice announcing the availability of the DRAFT Annual Action Plan and public comment period was published in The Blade (local circulation), The Sojourner's Truth, and La Prensa (minority publications). The notice was sent to the City's community partners and posted on the Department of Housing and Community Development's website.

To evaluate proposed funding requests, two Citizen Review Committees (CRCs) were established. One committee reviewed applications for non-homeless services submitted by local 501(c)(3) non-profit organizations, government agencies, quasi-governmental agencies, other non-profits, and Community Based Development Organizations (CBDOs). The second committee reviewed applications for homeless services. Members of the CRCs represented a broad range of community sectors, including local transportation authority, healthcare, the public library system, and social service organizations.

In addition, the DHCD regularly consults with community leaders, organizations, and residents to strengthen partnerships, improve neighborhood conditions, and address the needs of Toledo residents. A list of agencies and organizations consulted during the development of this plan is provided in Table 2 of the AP-10 Consultation section.

All public hearings are held in facilities that are accessible to persons with disabilities, including wheelchair access and designated handicapped parking. Reasonable accommodations are available upon request for individuals with disabilities, including assistance for participants attending virtual public hearings.

5. Summary of public comments

A summary of the public hearings and any public comments will be provided in the final version of this Action Plan.

6. Summary of comments or views not accepted and the reasons for not accepting them

All public comments received will be accepted.

7. Summary

The City of Toledo's 2025-2029 Five-Year Consolidated Plan identifies goals, objectives, and strategies to address the community's housing, neighborhood, and economic development needs. These needs were identified through an extensive citizen participation and stakeholder consultation process that included neighborhood residents, service providers, state agencies, and other community partners. The Consolidated Plan guides the City's use of CDBG, HOME, and ESG funds to implement programs and activities that address the priorities identified through the Needs Assessment and informed by the Market Analysis.

Over the next five years, the City will deliver housing, community, and economic development services to address the needs highlighted in this Plan. The City will work to balance these needs with available federal resources, while seeking to leverage funding through partnerships, supplemental grants, and combined funding opportunities to maximize impact. Through this comprehensive approach, combined with the City's capacity to implement programs, the goals and objectives outlined in this Plan are both feasible and achievable and will support improvements to the quality of life for Toledo residents.

PR-05 Lead & Responsible Agencies – 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

The following are the agencies or entities responsible for preparing the Consolidated Plan and also those responsible for the administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	TOLEDO	Department of Housing and Community Development
HOME Administrator	TOLEDO	Department of Housing and Community Development
ESG Administrator	TOLEDO	Department of Housing and Community Development

Table 1 – Responsible Agencies

Narrative (optional)

The City of Toledo Department of Housing and Community Development (DHCD) is the lead agency responsible for preparing and implementing the Consolidated Plan. The Department is also responsible for administering the expenditures of federal funds received from the U.S. Department of Housing and Urban Development (HUD) and for the implementation of the priorities and goals identified in this plan.

The City currently receives entitlement Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and the Emergency Solutions Grant (ESG) from HUD. To accomplish the priorities and goals represented in this plan, DHCD partners with non-profit organizations, affordable housing developers, City Departments, and local and regional agencies to improve the neighborhoods and living conditions of Toledo residents.

Consolidated Plan Public Contact Information

Department of Housing and Community Development
2025-2029 Five-Year Consolidated Plan
One Government Center, Suite 1800
Toledo, OH 43604
(419) 245-1400
neighborhoods@toledo.oh.gov

AP-10 Consultation – 91.100, 91.200(b), 91.215(I)

1. Introduction

The City of Toledo performed extensive outreach to essential stakeholders in the City, County, and State as part of the Consolidated Plan development process. The City made several outreach and engagement efforts and maintained regular communication with citizens, community agencies, and neighborhood groups.

To create the Annual Action Plan, the city collaborated with non-profit organizations such as Lucas Metropolitan Housing (LMH), Toledo Lucas County Homelessness Board (TLCHB), The Fair Housing Center (TFHC), Lucas County Land Reutilization Corporation (Land Bank), and other regional and local housing, community, and economic development organizations. The Citizen Participation Plan (CPP) process, which involves two public hearings, a 30-day comment period, and direct consultations, is utilized to gather feedback.

The COT utilized a Citizen Review Committee (CRC), which is comprised of residents from various community sectors who have broad or specific knowledge of current community activities, understand community issues, and can allocate resources as needed. CRC members evaluated applications, interviewed potential agencies, and made funding recommendations.

Provide a concise summary of the jurisdiction’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))

The City of Toledo continues to foster improved collaboration in all housing, health, and connected service efforts, and it actively partners with local organizations to carry out activities that improve quality of life for Toledo residents. The City constantly interacts with other organizations to identify plans and opportunities to improve cooperation and collaboration in service delivery to people. Every year, efforts are made in collaboration with local groups to improve coordination between service and housing agencies, as well as private and public sector agencies, in order to decrease service gaps. They include, but are not limited to the following:

- Toledo Lucas County Homelessness Board (TLCHB)
- Toledo Lucas County Port Authority
- United Way of Greater Toledo
- Greater Toledo Community Foundation
- University of Toledo
- Lucas Metropolitan Housing (LMH)
- Mental Health and Recovery Services Board of Lucas County (MHRSLC)
- Lucas County Children's Services Board (LCCS)
- Lucas County Veterans Service Commission
- Lucas County Land Reutilization Program (Land Bank)
- Toledo Public Schools
- Lucas County
- Private Businesses

A continuing commitment to these relationships and collaborations is vital to attaining the community's goals. For example, the MHR SBLC funds several entities that provide treatment and support services for youth and adults in the behavioral health system, thereby helping to alleviate one of the root causes of homelessness. DHCD collaborates with the Lucas County Land Bank to acquire properties for new construction, rehabilitation, and demolition reducing blight and promoting affordable housing development. The City is an important and effective advocate and source of support in moving projects forward that would otherwise not be completed due to lack of resources, as well as supporting community organizations dedicated to improving housing stock, such as LMH, community development corporations and other local nonprofits.

Other partnerships exist between the corporate community, faith-based organizations, public service agencies, housing providers, foundations, and other community organizations that advocate for persons in need. Increased communication with all community stakeholders will lead to more structured connections that support and promote the City of Toledo's strategies and goals.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

The City of Toledo has a strong partnership with the Toledo Lucas County Homelessness Board (TLCHB), which is the lead entity in the Home for Everyone Continuum of Care Board (CoC). TLCHB actively participated in the development of the Consolidated Plan through regular communication and discussions, as well as active participation in public meetings and hearings during the planning process. The city works closely with TLCHB to address the needs of those experiencing homelessness or at risk of homelessness through the provision of housing and services under the ESG and CDBG programs.

The TLCHB ensures all components of a successful CoC are in place, including a coordinated intake process, outreach and assessment standards, available supportive services, HMIS data management, emergency shelter, transitional housing, and permanent housing. TLCHB promotes an inclusive and comprehensive planning continuum, including a community-wide Congress that promotes and endorses review and input of the community's plan to end homelessness. The TLCHB released its updated Strategic Plan in 2024 that aligns with the Home for Everyone CoC's aim of providing safe, healthy, and affordable housing to all households experiencing homelessness in Toledo and Lucas County, Ohio. The plan outlines a streamlined process for coordinating and managing crisis response resources while accommodating best practices, resource availability, cultural shifts, and economic changes.

The proposed strategy entails a thorough evaluation of the system to ensure intentional interconnection and responsiveness. It also involves the establishment of oversight mechanisms to verify that the needs of the community are being adequately addressed, the dissemination of information to stakeholders and the general public, improved data access and utilization, and the expansion of housing options that are both appropriate and affordable.

The following goals are embedded in the CoC Strategic Plan and are fully supported by the City of Toledo.

- Increase Affordable and Accessible Housing Options
- Increase Oversight of the Homeless Response System
- Increase Data Access, Quality, and Understanding
- Strategically Transform the Homeless Response Framework
- Increase Awareness and Understanding

Through its collaboration with the Home for Everyone Continuum of Care, the City of Toledo is engaged in open communication with various institutions, including health care, foster care, and correctional facilities, to assist individuals being discharged from their programs. Additionally, all community institutions have policies stating that individuals are not to be discharged into a homeless situation. The TLCHB informed and educated all community stakeholders on contacting the CoC's Coordinated Access Information and Referral system (housed at United Way 211) if an individual is facing a housing crisis to ensure that people discharged from institutions do not immediately face homelessness.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

The City of Toledo has a strong partnership with the Toledo Lucas County Homelessness Board (TLCHB), which is the lead entity in the Home for Everyone Continuum of Care Board (CoC). TLCHB actively participated in the development of the Consolidated Plan through regular communication and discussions, as well as active participation in public meetings and hearings during the planning process. The city works closely with TLCHB to address the needs of those experiencing homelessness through the provision of housing and services under the ESG and CDBG programs. The City of Toledo uses data from the HMIS system and the TLCHB's strategic plan to determine ESG allocations. A Citizen's Review Committee (CRC) reviews applications and scores them based on a rubric designed in partnership with the TLCHB. This process provides flexibility for the community to fund high-performing programs that align with the CoC's vision.

The City of Toledo partners with the Toledo Lucas County Homelessness Board (TLCHB) in several ways to address homelessness in the community. Here are some key aspects of the partnership:

- **Funding Opportunities:** The City of Toledo provides federal funding through the Community Development Block Grant (CDBG) and Emergency Solutions Grant (ESG) programs. These funds are used to support various homelessness services, including emergency shelter, rapid rehousing, and rental assistance. HOME funds are utilized to support affordable housing development that could include permanent supportive housing.
- **No Barriers Housing:** This initiative prioritizes housing as the first step in ending homelessness. The program provides rapid access to housing followed by support services from Toledo area

partners. The City of Toledo collaborates with TLCHB to create partnerships throughout the community and support the mission of No Barriers Housing.

- Community Data Dashboard: TLCHB maintains a Community Data Dashboard to provide up-to-date homeless data from across the community. This tool helps the City of Toledo and other partners analyze homelessness data to support better targeting ESG funding and other resources more effectively to address homelessness.

These collaborative efforts help create a comprehensive approach to addressing homelessness in the City of Toledo. In addition, TLCHB, as the HMIS lead agency, works with a subcommittee of the Home For Everyone CoC Board to update and enforce HMIS policies and procedures for use and security. The lead analyst is responsible for up-to-date information regarding HUD requirements, and the HMIS database administrator is responsible for training homeless service providers and keeping an inventory of programs.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction’s consultations with housing, social service agencies and other entities

1	Agency/Group/Organization	Lucas Metropolitan Housing (LMH)
	Agency/Group/Organization Type	Housing PHA
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Lucas Metropolitan Housing (LMH) was consulted to assist in determining housing needs, how LMH serves those in public housing (including seniors and people with disabilities), and future development plans to further meet the public housing needs of Toledo residents. DHCD maintains regular communications with LMH leadership regarding issues related to public housing and its residents. Consultations with LMH will continue in efforts to provide safe, adequate, and decent affordable housing to low-income individuals and their families, including the rehabilitation and resale of Low-Income Housing Tax Credit projects that have ended their 15-year compliance period.
2	Agency/Group/Organization	Toledo Lucas County Homelessness Board (TLCHB)
	Agency/Group/Organization Type	Continuum of Care Lead Agency
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Toledo Lucas County Homelessness Board (TLCHB) is consulted regularly in all aspects related to ending homelessness in Toledo. The TLCHB was extensively consulted in the development of this Consolidated Plan and assisted with the promotion of the online Community Survey. The City will continue to work collaboratively with the TLCHB on all issues related to homelessness.

3	Agency/Group/Organization	The Fair Housing Center (TFHC)
	Agency/Group/Organization Type	Housing Services - Housing Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Fair Housing
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City of Toledo previously contracted with The Fair Housing Center for the development of the Analysis of Impediments (AI). Through the AI, The Fair Housing Center develops action steps needed for the elimination of impediments. The City of Toledo will continue to work collaboratively with The Fair Housing Center towards the elimination of barriers to Fair Housing.

Table 2 – Agencies, groups, organizations who participated

Identify any Agency Types not consulted and provide rationale for not consulting

All pertinent agencies in the City and County were consulted.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Toledo Lucas County Homelessness Board	Elimination of Homelessness is a goal in both the CoC CASE Plan and the City of Toledo 5-year Consolidated Plan.
Analysis of Impediments to Fair Housing Choice	The Fair Housing Center	Elimination of barriers to housing, particularly adequate affordable housing in areas of opportunity, and accessibility to all is a goal of the City's 2025 Analysis of Impediments and the Consolidated Plan.
TARTA Next Final Report Sept 2022	TARTA	Local and regional public transportation systems were analyzed in this plan. The City continually evaluates ways to improve transportation services and accessibility to low-moderate-income (LMI) residents. A goal of the Consolidated Plan is to find ways to improve transportation services which facilitate access to jobs for LMI persons. The goal of the TARTA Next Plan is to ensure public transit services in the Toledo area make a positive impact on residents, businesses, and visitors alike.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Forward Toledo	Toledo City Plan Commission	Forward Toledo is the city’s comprehensive land-use plan which presents a roadmap for Toledo’s future growth that encourages density and more options for housing, transit and alternative modes of travel, walkability and sustainability. The Consolidated Plan aligns its goals and strategies with Forward Toledo related to more stable housing stock, more jobs for residents, and more attractive neighborhoods.
Toledo Together: 10-Year Action Plan for Housing	Toledo Department of Housing and Community Development	The Plan establishes a unified vision for investments in housing in Toledo and a roadmap to achieve this vision over the next 10 years, focusing on addressing disparities and advancing racial equity, while creating policies and programs that will benefit everyone, such as an improved environment for residential and mixed-use development. The Consolidated Plan aligns with these goals and priorities.
Toledo Strategic Plan for Arts and Culture	The Arts Commission	The common goal is the reduction of neighborhood blight. Public art and elevating the city’s cultural vibrancy are important contributions to the goal of neighborhood revitalization.
Strategic Plan 2025-2029	Lucas Metropolitan Housing (LMH)	The provision of safe and sustainable affordable housing for LMI residents in Toledo is a goal in both the 5-year Consolidated plan and LMH's strategic plan.
Peace in Motion: Toledo's Path to Community Safety	City of Toledo Mayor Office on Neighborhood Safety and Engagement	This comprehensive five-year plan is a cross-sector, community-engaged-and-owned plan that will guide efforts to address gun violence in Toledo for the next five years. The plan is part of an ongoing public health approach to addressing gun violence. Specific elements of the plan can be supported through investments of federal funds.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

The City of Toledo Department of Housing and Community Development has cultivated many relationships in the community leading to the development of efficient strategies that assist in addressing community issues. Those relations include individuals, neighborhood groups, investors and organizations working towards the stabilization and growth of Toledo. DHCD will continue to cultivate relationships that result in an effective and efficient implementation of the Consolidated Plan.

AP-12 Participation – 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

Citizen participation is an essential part of the consolidated planning process because it helps ensure that decisions are made with careful attention to articulated community needs and prioritizes the preferences of Toledo residents. Further, the input of stakeholders and community members generates additional public awareness about the consolidated planning process. Public involvement in the process allowed for the perspectives of residents to be elevated and highlighted during the decision-making process, which gave the City of Toledo more relevant information to develop the Consolidated Plan's priorities and goals. Receiving input and buy-in from planning officials, stakeholders, agency staff, and residents of Toledo played a significant role in helping the plan take shape.

All events are publicized two weeks in advance in *The Blade*, *The Toledo Journal* and/or *The Sojourner's Truth*, and *La Prensa* (minority papers), and on the COT's website. Minority papers target the African-American and Hispanic communities.

A public notice announcing the mandatory application meeting was published November 14, 16, and December 2, 2025. A press release was sent December 1, 2025, and December 30, 2025, to news and social media platforms.

On February 25, February 27, and March 1, 2026, a public notice was published announcing the availability of the Draft 2026-2027 Action Plan, 30-day comment period and public hearings. On March 2, 2026, a press release was sent to news and social media platforms.

Furthermore, the public notices and press releases were emailed to local community partners and the COT's Third-Party Partners. Public comments will be accepted from March 25 through April 24, 2026.

Two public hearings will be held in person on March 26 and April 2, 2026 in City Council Chambers at 5:30 p.m. Public hearings are held in buildings that are accessible to disabled individuals, wheelchair accessible, and include accessible parking. If there is a virtual public hearing, people with disabilities can request services.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Newspaper Ad	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	n/a	n/a	All comments received will be accepted.	<p>http://www.toledoblade.com/</p> <p>http://www.thetoledojournal.com/</p> <p>http://www.laprensatoledo.com/</p> <p>http://www.thetruthtoledo.com/</p>
2	Public Hearing	<p>Minorities</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	TBD	TBD	All comments received will be accepted.	<p>https://toledo.oh.gov/departments/housing-community-development</p>
3	Internet Outreach	<p>Minorities</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	The public notice was posted to the city's website.	TBD	All comments received will be accepted.	<p>https://toledo.oh.gov/departments/housing-community-development</p>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Social Media	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	The public notice was posted on the city's website and a press release from the Mayor's office was released.	TBD	All comments received will be accepted.	

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

The City of Toledo receives three annual entitlement allocations from HUD. These include Community Development Block Grant (CDBG), HOME Investment Partnership Program (HOME), and Emergency Solutions Grant (ESG). These federal resources support housing, community development, and programs that assist low- and moderate-income residents throughout the city.

The City's strategic plan establishes the framework for how the Department of Housing and Community Development (DHCD) will use these funds over the next five years to address Toledo's housing, community, and economic development needs. The Consolidated Plan outlines the City's policies, priorities, and goals based on an analysis of local housing conditions, the housing market, homelessness, public service needs, economic development opportunities, and overall community development needs.

The anticipated entitlement funding for Program Year 2026 includes:

- CDBG: \$7,046,960.00
- HOME: \$1,965,724.17
- ESG: \$627,043.00

Prior Year Resources for CDBG and HOME are currently being finalized and will be included in the final version of this Annual Action Plan once confirmed. The 2026-2027 program year for the City of Toledo starts on 7/1/2026 and ends on 6/30/2027. This plan represents the second Annual Action Plan implementing the goals and priorities outlined in the City's 2025-2029 Consolidated Plan.

The table below summarizes estimated resources available to address the goals of this Annual Action Plan.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	7,046,960	0.00	1,894,000	8,940,960	0.00	The CDBG program is a flexible program that provides resources to address a wide range of unique housing and community development needs to ensure decent affordable housing, to provide services to the most vulnerable in our communities, and to create jobs through the expansion and retention of businesses.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	1,965,724	0.00	5,024,000	6,989,724	0.00	The HOME Program allows for a wide range of affordable housing activities including acquisition, development of new homeownership and rental housing, homeowner and rental rehabilitation, homebuyer activities, and tenant-based rental assistance, with the intent to provide safe, adequate and decent affordable housing to lower-income households and expand the capacity of non-profit housing providers.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	Public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	627,043	0.00	0.00	627,043	0.00	In accordance with the McKinney-Vento Homeless Assistance Act, as amended by the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act, HUD distributes Emergency Solutions Grant (ESG) funds to communities for street outreach, emergency shelter, homelessness prevention, rapid re-housing assistance, and homeless management information systems. The annual allocations are typically fully expended every program year.

Table 5 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

Many of the goals mentioned in the Consolidated Plan rely heavily on CDBG funding. HOME and ESG funding also help to advance affordable housing programs and homelessness prevention activities. By combining these resources with other local, state, and federal resources (where applicable), the city is better positioned to respond to and meet the community's varied needs. The coordination of these financing sources, together with excellent connections with community organizations and stakeholders, strengthens the city's overall ability to deliver effective programs and services. This collaborative approach enables the city to increase the scope and impact of its projects. The city's combined investments help to provide a more stable and suitable living environment for every resident.

HOME and ESG funds both have mandatory matching requirements. While CDBG funds do not require a match, the DHCD's policy requires all third-party partners that receive CDBG funds to provide a 1:1 match for every dollar received. This is the same 1:1 match as required by HUD for ESG funds. Applicants for CDBG and ESG funding must specify and document the match in their submissions. HUD sets the matching requirement for HOME funding based on extreme fiscal distress criteria. According to CFR 92.218, match contributions must account for at least 25% of funds drawn from the HOME program.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

To carry out housing, economic and community development activities, CDBG- and HOME-funded programs may obtain publicly-owned land or property through the Lucas County Land Reutilization Corporation (Land Bank). The Land Bank acquires vacant and abandoned foreclosed properties and converts them to productive use. The Land Bank assists eligible residents buy and renovate properties, and it collaborates with community members to repurpose vacant lots from demolitions for use by residents, community groups, neighborhood associations, and affordable housing developers. Vacant lots are frequently offered to nearby homeowners to raise lot sizes rather than being developed, depending on the neighborhood, density, housing demand, and other considerations. The city is scheduled to demolition another 500 properties through 2026.

In meeting HUD's CDBG objective of benefit to low- and moderate-income persons and Elimination of Slum and Blight, the Land Bank meets the following goals and objectives established in this plan:

- Demolition of Blighted Properties
- Decrease Rodents in the City of Toledo
- Establish and Maintain Community Gardens
- Environmental Remediation of Contaminated Sites for Redevelopment
- Down Payment/Closing Costs Assistance (through acquisition and rehabilitation of properties)
- New construction (only by Community-Based Development Organizations CBDO's)

Additionally, CDBG funds will be used to promote economic development opportunities by assisting for-profit businesses with the attraction or retention of businesses and jobs, façade improvements, and tax and real estate incentives.

Discussion

The City has a history of funding and participating in many community planning initiatives with a wide range of stakeholders in order to better understand resident’s regional and neighborhood issues. These meetings resulted in the formulation of many community plans that had a defined vision, goals, objectives, and recommended activities, and potential funding sources. The City has been investing in these neighborhoods and sees an opportunity to continue to leverage its CDBG, HOME, and ESG funds with other city capital expenditures and private sector financing for targeted neighborhood improvements that directly respond to the needs of the city’s residents.

One proposed strategy is to use the CDBG Neighborhood Revitalization Strategy Areas (NRSA) to focus federal dollars and align them with other investments.

DHCD is launching the NRSA UPLIFT Program in the Englewood, Junction, and Old South End areas to address the appraisal gap, which is defined as the difference between a project’s total development costs and the market price at which it may be sold. The program will leverage public funding to fill appraisal gaps in the development of affordable housing. UPLIFT expands on DHCD’s previous programs and incorporates a diverse set of stakeholders and partners. The program includes two activities:

- Providing a subsidy to eligible developers, based on the difference or gap between the costs to build new or substantially rehabilitated homes and the appraised/sale value of the home. Rehabilitated and new homes will be sold to first-time, low-income homebuyers.
- The program will also provide a grant to first-time, low-income homebuyers purchasing a home in NRSA that is in need of rehabilitation. DHCD will work with area lenders to advertise renovation mortgage products, providing a grant to reduce construction costs.

The NRSA UPLIFT Program is funded through several program sources:

- 2023 Community Project Funding: In 2024, COT received a \$4 million federal Community Project Grant sponsored by Rep. Marcy Kaptur. Of this award, \$1,500,000 is dedicated to the UPLIFT Program.
- 2024 HUD PRO Housing: Toledo received \$4,000,000 for a comprehensive zoning rewrite, pre-approved templates for new housing construction, and funding for the UPLIFT Program. DHCD received \$1,600,000 for the program pool and, with the grant award, had pledged to expand the program from two to all three NRSAs and to increase the overall funding impact to 75 new or preserved homes during the grant performance period.
- 2025 Welcome Home Ohio: The City of Toledo is applying for \$9,500,000 from the Ohio Department of Development 2025 Welcome Home Ohio grant. This additional funding will provide up to \$100,000 in subsidies per home for the rehabilitation or construction of 125 homes.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable Housing Development	2025	2029	Affordable Housing	Citywide Old South End NRSA Englewood NRSA Junction Choice Neighborhood NRSA	Affordable Housing Development	CDBG: \$782,582 HOME: TBD	Homeowner Housing Added: TBD - Household Housing Units Rental Units Constructed: TBD - Household Housing Units
2	Homeownership Opportunities	2025	2029	Affordable Housing	Citywide	Homeownership Opportunities	HOME: TBD	Direct Financial Assistance to Homebuyers: TBD – Households Assisted
3	Housing Improvements	2025	2029	Affordable Housing	Citywide Old South End NRSA Englewood NRSA Junction Choice Neighborhood NRSA Vistula Neighborhood	Housing Improvements	CDBG: \$1,563,538 HOME: TBD	Homeowner Housing Rehabilitated: TBD - Household Housing Units

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Slum and Blight Clearance	2025	2029	Affordable Housing	Citywide Old South End NRSA Englewood NRSA Junction Choice Neighborhood NRSA Vistula Neighborhood	Housing Improvements Slum and Blight Clearance	CDBG: \$250,000	Housing Code Enforcement / Foreclosed Property Care: TBD - Household Housing Unit
5	Fair Housing Planning & Services	2025	2029	Affordable Housing	Citywide	Fair Housing Planning & Services	CDBG: \$160,000	Public service activities for Low/Moderate Income Housing Benefit: TBD - Households Assisted
6	Public Services	2025	2029	Non-Homeless Special Needs	Citywide Old South End NRSA Englewood NRSA Junction Choice Neighborhood NRSA Vistula Neighborhood	Public Services	CDBG: \$1,057,000	Public service activities other than Low/Moderate Income Housing Benefit: TBD - Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	Homelessness Services	2025	2029	Homeless	Citywide	Services for the Homeless	ESG: \$627,043	Homeless Person Overnight Shelter: TBD - Persons Assisted Tenant-based rental assistance / Rapid Rehousing: TBD - Households Assisted
8	Infrastructure & Public Facility Improvements	2025	2029	Non-Housing Community Development	Citywide	Infrastructure & Public Facility Improvements	CDBG: \$1,000,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: TBD - Persons Assisted
9	Economic Development	2025	2029	Non-Housing Community Development	Citywide Old South End NRSA Englewood NRSA Junction Choice Neighborhood NRSA	Economic Development	CDBG: \$740,000	Businesses Assisted: TBD - Businesses Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
10	Planning and Administration	2025	2029	Administration	Citywide Old South End NRSA Englewood NRSA Junction Choice Neighborhood NRSA Vistula Neighborhood	Affordable Housing Development Homeownership Opportunities Housing Improvements Slum and Blight Clearance Fair Housing Planning & Services Public Services Services for the Homeless Infrastructure & Public Facility Improvements Economic Development	CDBG: \$1,409,392 HOME: \$196,572	Other: 1

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Affordable Housing Development
	Goal Description	Funds will be used to assist in the creation or preservation of affordable housing units for rental and homeownership.
2	Goal Name	Homeownership Opportunities
	Goal Description	Funds will be used to support low- and moderate-income residents in accessing homeownership through the Home at Last downpayment assistance program.
3	Goal Name	Housing Improvements
	Goal Description	Funds will be used to support low- and moderate-income residents in the rehabilitation and accessibility modification of their homes to ensure housing is healthy, safe, lead free, and can accommodate the city's aging population and persons with disabilities.
4	Goal Name	Slum and Blight Clearance
	Goal Description	Funds will be used to ensure vacant, abandoned, or foreclosed housing is secured, free from health and safety hazards, or demolished to enhance the living environment of neighborhood residents.
5	Goal Name	Fair Housing Planning & Services
	Goal Description	Funds will be used to help eliminate discrimination in the provision of housing and housing-related services and reduce segregation by affirmatively promoting inclusive communities and increasing the supply of genuinely open housing.
6	Goal Name	Public Services
	Goal Description	Funds will be used to support nonprofit agencies in the provision of public services including crime prevention and safety, programs for youth and seniors, healthcare and mental health services, basic needs and food assistance, transportation support, community nonprofit capacity building, and other services needed in the community. The funds will also be used to support specific populations such as the homeless, veterans, victims of domestic violence, and other special needs populations as required.
7	Goal Name	Homelessness Services
	Goal Description	Funds will be used to operate a centralized system for homeless assistance to determine needs and match individuals and families with the type of assistance needed. Funding will also provide outreach services, emergency shelter, temporary housing, and rapid rehousing assistance for the homeless population and those at risk of homelessness.

8	Goal Name	Infrastructure & Public Facility Improvements
	Goal Description	The city will use CDBG funds to support the rehabilitation of public facilities to ensure that nonprofit agencies are able to best serve the low- and moderate-income residents of the city by making strategic rehabilitation improvements. CDBG funds may be used for city buildings that require accessibility improvements to ensure they can adequately serve the city's population that have mobility challenges. CDBG funds may be used for public infrastructure improvements in CDBG-eligible Census Tracts or Block Groups specifically to make street and sidewalk improvements, public parks improvements, sewer improvements, and to address any flood drainage or related emergency management issues, and other issues as appropriate.
9	Goal Name	Economic Development
	Goal Description	Funds will be used to support the development and growth of small businesses in the City of Toledo through the provision of loans and grants through the city's Economic Development office or in partnership with relevant economic development agencies in the city. The types of assistance may include grants, loans, technical assistance, small business development or mentorship programs, or other types of incentives and services targeting for-profit businesses in Toledo.
10	Goal Name	Planning and Administration
	Goal Description	Funds will be used to ensure the proper administration and management of the CDBG, HOME, and ESG programs.

Projects

AP-35 Projects – 91.220(d)

Introduction

The COT's priority housing and community development needs were identified in the 2025-2029 Five-Year Consolidated Plan. The DHCD will coordinate the use of federal funds for the City's strategies and actions to meet the needs of low- to moderate-income households and communities.

The following are proposed projects that will be undertaken in the 2026 (52nd) PY with CDBG, HOME, and ESG funding to address the Consolidated Plan's priority needs and objectives. The total amount of funding for these projects include:

- CDBG: \$7,046,960.00
- HOME: \$1,965,724.17
- ESG: \$627,043.00

All proposed projects' budgets will be proportionally increased or decreased in proportion to the estimated funding levels to match actual allocation amounts.

Projects

#	Project Name
1	DHCD: Planning and Administration
2	DHCD: Division of Housing Program Delivery
3	Housing Preservation/Rehabilitation Fund
4	Community Housing Development Organization (CHDO) Set-Aside
5	Homeowner Rehabilitation (Subrecipient and Internal)
6	Rental Housing Development
7	Down-Payment Assistance (HOME At Last Program)
8	Home Buyer Development
9	COT Rooftops Program
10	2026 Homelessness Services
11	Public Services
12	NRSA Strategic Development Initiative
13	NRSA Code Compliance Demolition
14	COT Department of Parks and Youth Services
15	Section 108 Loan Debt Service
16	Toledo Capacity Building Institute

Table 7 - Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

The City of Toledo's priorities were determined by reviewing data from the Citizen Participation and Agency Consultation process section of the 2025-2029 Five-Year Consolidated Plan, as well as data from the Needs Assessment and Market Analysis sections. As a result of the findings, the City identified priority needs and associated goals to address these needs. The following are the key priorities identified:

- Affordable Housing Development
- Homeownership Opportunities
- Housing Improvements
- Slum and Blight Clearance
- Fair Housing Planning & Services
- Public Services
- Services for the Homeless
- Infrastructure & Public Facility Improvements
- Economic Development

To address these priority needs, associated goals were developed and linked to these needs, allocation amounts were identified, and specific quantifiable outcomes were identified.

The greatest hurdle to addressing underserved needs in the city is the consistent decrease in program funding as a result of federal, state, and municipal budget cuts. Even as demands grow, housing and non-housing funding are insufficient to meet the demand for unmet needs. In recent years, the overall amount of funding requested has regularly exceed the total amount available. Inadequate financial resources have also been identified as the most significant barrier to organizations serving underserved needs.

In order to ensure fair housing, the city contracted with The Fair Housing Center to conduct an Analysis of Impediments to Fair Housing Choice (AI), which identified impediments to getting safe, adequate, and decent affordable housing. In conjunction with community partners, the city and the Fair Housing Center have implemented a Fair Housing Action Plan to reduce barriers to fair and affordable housing.

AP-38 Project Summary

Project Summary Information

1	Project Name	DHCD: Planning and Administration
	Target Area	Citywide
	Goals Supported	Affordable Housing Development Homeownership Opportunities Housing Improvements Slum and Blight Clearance Fair Housing Planning & Services Public Services Homelessness Services Infrastructure & Public Facility Improvements Economic Development Planning and Administration
	Needs Addressed	Affordable Housing Development Homeownership Opportunities Housing Improvements Slum and Blight Clearance Fair Housing Planning & Services Public Services Services for the Homeless Infrastructure & Public Facility Improvements Economic Development
	Funding	CDBG: \$1,249,392 HOME: \$196,572
	Description	The general operations in terms of administration and reporting requirements, program administration and staff monitoring, neighborhood revitalization, and fiscal oversight.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	This project will not directly benefit low/moderate income residents but is necessary for the effective management of the CDBG, HOME, and ESG programs.
	Location Description	City of Toledo, Department of Housing and Community Development One Government Center, Suite 1800, Toledo, Ohio 43604

	Planned Activities	Administration and compliance of all grant activities, functions, and procedures. Technical assistance for all subgrantees as needed. Staffing and overhead costs related to the planning, administration, development, and implementation of the Consolidated Plan, Annual Action Plan, and CAPER; information tracking and compilation; federal grant reporting; IDIS data input; fiscal oversight; monitoring (on-site monitoring visits, review and evaluation of agency information, assessment of progress and completion of activities, compliance with Federal regulations, and so on); general administration of funds and related activities.
2	Project Name	DHCD: Division of Housing Program Delivery
	Target Area	Citywide
	Goals Supported	Affordable Housing Development Homeownership Opportunities Housing Improvements
	Needs Addressed	Affordable Housing Development Homeownership Opportunities Housing Improvements
	Funding	CDBG: \$900,000
	Description	Funding to support staffing costs associated with the Department of Housing and Community Development Housing Division for program delivery expenses, including application Intake, underwriting, construction and project management, inspections, monitoring, and other related expenses for the city's and third-party partners home repair programs.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	This project will not directly benefit low/moderate income residents but is necessary for the effective management of the home repair, rehabilitation, and new construction programs. Project outcomes are quantified for each project below.
	Location Description	City of Toledo, Department of Housing and Community Development One Government Center, Suite 1800, Toledo, Ohio 43604
Planned Activities	Owner-Occupied Rehabilitation; Homebuyer unit production through new construction or acquisition; rehabilitation and resale; down payment and closing costs through the Home-At-Last Program; Paint, Roof, and Emergency Repair Programs; Lead-Based Paint Hazard Programs; and Rental Housing Development Projects are among the activities related to the administration duties of the Housing Division.	
3	Project Name	Housing Preservation/Construction Fund
	Target Area	Citywide
	Goals Supported	Housing Improvements

	Needs Addressed	Housing Improvements
	Funding	CDBG: \$782,568
	Description	Funding for the substantial rehabilitation of owner-occupied housing, including emergency repairs for seniors and improvements necessary to achieve code compliance. Assistance may also be provided for new residential construction in the City of Toledo, including materials, labor and other construction-related costs.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	LMI households will benefit from this project.
	Location Description	Housing units will be located throughout the city of Toledo.
	Planned Activities	Owner-occupied housing rehabilitation, or housing rehabilitation and resale.
4	Project Name	Community Housing Development Organization (CHDO) Set-Aside
	Target Area	Citywide
	Goals Supported	Affordable Housing Development
	Needs Addressed	Affordable Housing Development
	Funding	HOME: \$294,859 HOME: \$550,000 (carryover)
	Description	GAP financing and operating assistance are available for single- or multi- family rehabilitation or new construction projects owned, developed, or sponsored by Community Housing Development Organizations (CHDOs).
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	LMI households will benefit from this project.
	Location Description	Housing units will be located throughout the city of Toledo.
	Planned Activities	New construction of homeownership housing.
5	Project Name	Homeowner Rehabilitation (Subrecipient and Internal)
	Target Area	Citywide
	Goals Supported	Housing Improvements
	Needs Addressed	Housing Improvements
	Funding	HOME: \$2,474,000 (carryover)

	Description	To assist low- and moderate-income homeowners with housing rehabilitation in order to restore their homes to decent, safe, and sanitary conditions, thereby preserving the housing stock. Implemented by sub-recipients and the City of Toledo Housing Division.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	low- and moderate-income homeowners will benefit from this activity.
	Location Description	Housing units will be located throughout the city of Toledo.
	Planned Activities	Homeowner housing rehabilitation to address code violations, health and safety concerns, and lead-based paint hazards.
6	Project Name	Rental Housing Development
	Target Area	Citywide
	Goals Supported	Affordable Housing Development
	Needs Addressed	Affordable Housing Development
	Funding	HOME: \$1,474,293
	Description	The gap financing for new construction or rehabilitation of multi-unit rental housing developed by non-profit or for-profit developers. The projects are chosen based on gap funding requirements, consistency with COT affordable housing priorities, readiness to proceed, and successfully securing all land-use entitlements and project financing commitments.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	low- and moderate-income households will benefit from this project.
	Location Description	Housing units will be located throughout the city of Toledo.
	Planned Activities	The projects are intended to bridge the funding gap for developers and agencies working on multi-unit projects. These are multi-unit buildings that have undergone new construction, rehabilitation, or conversion to housing.
7	Project Name	Down-Payment Assistance (HOME At Last Program)
	Target Area	Citywide
	Goals Supported	Homeownership Opportunities
	Needs Addressed	Homeownership Opportunities
	Funding	HOME: \$1,000,000 (carryover)

	Description	To provide eligible first-time home buyer households purchasing single-family units with 0% interest deferred payment loans for down payment and closing cost assistance.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	low- and moderate-income households will benefit from this project.
	Location Description	Citywide
	Planned Activities	Provision of direct financial assistance to low- and moderate-income homebuyers for down payments and closing costs.
8	Project Name	Home Buyer Development
	Target Area	Citywide
	Goals Supported	HOME: Home Buyer Development
	Needs Addressed	Improving Housing Affordability Improving Neighborhood Conditions Increase Home Repairs and Housing Preservation
	Funding	HOME: \$1,000,000 (carryover)
	Description	The new construction or acquisition, rehabilitation, and resale of homebuyer units.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	TBD low- and moderate-income family will benefit from this activity.
	Location Description	Citywide
	Planned Activities	To provide gap financing for new construction or acquisition, rehabilitation, and resale of homebuyer units. Green building standards will be followed during construction and rehabilitation.
9	Project Name	COT Rooftops Program
	Target Area	Citywide Old South End NRSA Englewood NRSA Junction Choice Neighborhood NRSA Vistula Neighborhood
	Goals Supported	Housing Improvements
	Needs Addressed	Housing Improvements

	Funding	CDBG: \$500,000
	Description	To provide roof repair or replacement services in the City of Toledo.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	low- and moderate-income households will benefit from a roof repair/replacement.
	Location Description	Housing units will be located throughout the city of Toledo.
	Planned Activities	Roof repairs/replacements for low- and moderate-income households.
10	Project Name	2026 Homelessness Services
	Target Area	Citywide
	Goals Supported	Homelessness Services
	Needs Addressed	Services for the Homeless
	Funding	ESG: \$627,043
	Description	The provision of services to the homeless and those at risk of becoming homeless in the community, as well as services related to the overall management of the community's homeless system.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	homeless individuals will be provided with shelter, and households will receive rapid rehousing assistance.
	Location Description	Citywide
	Planned Activities	The activities related to coordinated assessment, rapid re-housing, direct financial assistance, permanent supportive housing, emergency shelters, youth homelessness, Homeless Management Information System (HMIS) and administration of the TLCHB.
11	Project Name	Public Services
	Target Area	Citywide Old South End NRSA Englewood NRSA Junction Choice Neighborhood NRSA Vistula Neighborhood
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$1,057,000

	Description	Various public service activities provided by nonprofit subrecipient agencies throughout the city.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	low- and moderate-income persons will be assisted.
	Location Description	Public service activities will be provided throughout the city of Toledo.
	Planned Activities	TBD
12	Project Name	NRSA Strategic Development Initiative
	Target Area	Citywide Old South End NRSA Englewood NRSA Junction Choice Neighborhood NRSA Vistula Neighborhood
	Goals Supported	Economic Development
	Needs Addressed	Economic Development
	Funding	CDBG: \$500,000
	Description	To support economic development activities within a Neighborhood Revitalization Strategy Area (NRSA) to stimulate investment, promote business growth, create job opportunities for low- and moderate-income residents, and strengthen neighborhood commercial corridors.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	TBD
	Location Description	Citywide
	Planned Activities	Activities will include support for small business development and expansion, façade and commercial property improvements, targeted investments to revitalize neighborhood commercial corridors, and initiatives that promote job creation and economic opportunities for low- and moderate-income residents.
13	Project Name	NRSA Code Compliance Demolition

	Target Area	Citywide Old South End NRSA Englewood NRSA Junction Choice Neighborhood NRSA Vistula Neighborhood
	Goals Supported	Slum and Blight Clearance
	Needs Addressed	Slum and Blight Clearance
	Funding	CDBG: \$250,000
	Description	Addresses vacant, abandoned, and foreclosed properties through Code Compliance activities, including securing structures, eliminating health and safety hazards, and demolition, to improve neighborhood living conditions.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	TBD
	Location Description	Citywide
	Planned Activities	Activities will include the identification and inspection of vacant, abandoned, and foreclosed properties; securing unsafe structures; abating health and safety hazards; and demolishing properties that pose a risk to the community to improve neighborhood conditions.
14	Project Name	COT: Department of Parks and Youth Services
	Target Area	Citywide
	Goals Supported	Infrastructure & Public Facility Improvements
	Needs Addressed	Infrastructure & Public Facility Improvements
	Funding	CDBG: \$1,000,000
	Description	Revitalization of six parks (Savage Park, Vistula Park, Collins Park Pool, Ravine II Park Ballfields, New Park in Englewood, Sports Facility Feasibility Study) located in the City of Toledo.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	Toledo residents will benefit from these projects.
	Location Description	Citywide

	Planned Activities	Savage Park: purchase and installation of new open-air picnic shelter. Vistula Park: New Park development in the Vistula Neighborhood. Collins Park Pool: Demolition of existing pool. Ravine II Park: Renovation of the ballfield complex. Englewood Neighborhood Park: New Park development in the Englewood Neighborhood. Sprots Facility Feasibility Study: Feasibility study for construction of an indoor sports facility on Monroe Street at the former Jobs and Family Services Site.
15	Project Name	HUD Section 108 Debt Service
	Target Area	Citywide
	Goals Supported	Planning and Administration
	Needs Addressed	Planning and Administration
	Funding	CDBG: \$200,000
	Description	Repayment of Section 108 loan.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	City of Toledo, Department of Housing and Community Development One Government Center, Suite 1800, Toledo, Ohio 43604
	Planned Activities	Repayment of Section 108 loan.
16	Project Name	Toledo Neighborhood Capacity Building Institute (TNCBI)
	Target Area	Citywide
	Goals Supported	Planning and Administration
	Needs Addressed	Public Services
	Funding	CDBG: \$150,000
	Description	Providing technical capacity training and project grants to nonprofit organizations to help them build organizational capacity and project management skills in order to carry out neighborhood revitalization and economic development activities.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	TBD non-profit organizations
	Location Description	Citywide
	Planned Activities	Activities will include organizational assessment, technical assistance, and the distribution of mini grants for CDBG eligible neighborhood and economic development projects, as well as project development for nonprofit organizations.

AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

In general, various federally grant-funded activities, such as public services, economic development, housing rehabilitation, home modifications, and new construction activities, are offered on a citywide basis to low- and moderate-income (LMI) individuals and households pursuant to related CDBG, HOME, and ESG regulations. Additionally, the City has identified and mapped areas of the municipality where the LMI population is 51% or more. LMI census tracts are: 8, 9, 10.01, 10.02, 11, 12.02, 13.02, 14, 15, 16.01, 16.02, 17, 18, 19, 20, 24.01, 24.02, 25, 26, 27, 28, 29, 30, 31, 32, 33, 35, 36, 39.01, 39.02, 40, 42, 46, 47.01, 47.02, 48, 49, 50, 51.01, 51.02, 52, 53, 54, 57.01, 59.02, 66, 67, 68.01, 68.02, 73.02, 73.06, 73.07, 103, 105 and 106. Relevant area benefit activities will be located exclusively in these areas.

There are four additional target areas in Toledo for specific place-based strategies to reach the goals outlined in the Five-Year Consolidated Plan. The percentage of the city's entitlement funds (specifically CDBG, HOME, and ESG funds) to be distributed to these geographic areas are included in the table below.

Importantly, there are many other funding sources that the City of Toledo receives and which are used for housing development and infrastructure improvements throughout the city, including other federal and state funds. Many of these funds are also targeting the geographic priority areas but are not reflected in the percentages below because they are not the CDBG, HOME, and ESG entitlement funds received by the city from HUD. The city's actual level of effort in these priority areas is much more significant than the percentage distribution of HUD entitlement funding.

Geographic Distribution

Target Area	Percentage of Funds
Citywide	2
Old South End NRSA	4
Englewood NRSA	8
Junction Choice Neighborhood NRSA	84
Vistula Neighborhood	2

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The redevelopment and stabilization of Toledo neighborhoods are influenced by local, regional, and national economic and housing conditions. Neighborhoods that were once vibrant have been plagued by issues such as an aged housing stock, an increase in abandoned and dilapidated structures that contribute to blight, and a lack of opportunities for move-in ready homes and economic development opportunities. For 2025-2026, approximately \$1.6 million has been allocated to various housing and

service programs in the geographic priority areas. These include the three Neighborhood Revitalization Strategy Areas (NRSAs), as well as the Vistula Neighborhood which is currently being investigated as an additional NRSA.

Activities will be carried out by Community Based Development Organizations (CBDOs) and nonprofit service agencies. On April 4, 2025, the Department held a meeting with all five currently certified CBDOs. Of these, four agencies submitted recertification applications, and two have been successfully recertified. Their certifications will be valid from July 1, 2025, to June 30, 2026. The remaining two applications were not approved for recertification.

In an effort to expand the pool of certified organizations, the Department also solicited new CBDO applications. On May 28, 2025, a meeting was held with nonprofit organizations interested in obtaining CBDO certification. Sixteen individuals attended, representing a range of agencies. As a result, the City reviewed and approved two new organizations for certification. As of July 1, 2025, the City has four certified CBDOs. The city of Toledo will seek new CBDOs for the upcoming program year and work with existing CBDOs to recertify.

In the Old South End NRSA, an approved CBDO is completing an in-fill housing construction project of an approximately 1,400 sq. ft. modular home that will have 3 bedrooms and 2 bathrooms for an income-eligible household. In addition, other activities include youth services, a food access community garden, roof repair and replacement, homeowner rehabilitation, and park improvements.

The Englewood NRSA will primarily focus on emergency senior home repairs, roof repairs and replacements, and homeowner rehabilitation.

In the Junction Choice Neighborhood NRSA, roof repair and replacement and homeowner rehabilitation, primarily for seniors, will be the primary focus of funded activities.

The final neighborhood is the historic Vistula neighborhood. Activity funding concentrated in this area supports an afterschool program. The city is currently engaged with a consultant to prepare another NRSA application for this neighborhood. Another \$200,000 in CDBG funds is being allocated to this area as a Choice Neighborhood Planning Grant match for Economic Development, Park Improvements, and Community Center funding. In the event the NRSA is approved, it will be added as a fourth geographic target area.

Discussion

All projects and activities funded through the CDBG, HOME, and ESG programs are intended to contribute to HUD's national goal of assisting low- to moderate- income individuals, families, households, and communities.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The City of Toledo makes affordable housing available through a variety of methods, including the use of CDBG, HOME, and ESG funding. The city will use funding to support affordable housing during the 2026 PY through rental and security deposit assistance, supportive services, the building of new units, the acquisition and rehabilitation of existing units, owner-occupied home improvements, and permanent supportive housing.

Furthermore, specific one-year affordable housing goals will satisfy the City's fair housing goals outlined in the Analysis of Impediments to Fair Housing Choice (AI). In the tables below, the project and program goals outlined in the Annual Action Plan are aimed at non-homeless, homeless, and special-needs households.

One Year Goals for the Number of Households to be Supported	
Homeless	130
Non-Homeless	136
Special-Needs	43
Total	309

Table 9 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	130
The Production of New Units	50
Rehab of Existing Units	89
Acquisition of Existing Units	40
Total	309

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

The demand for safe and affordable housing units for extremely low-, very low-, and low-income families remains extremely high. The COT intends to continue exploring additional alternatives that address this need and will identify significant activities that will assist in reaching the City's high priority. In addition, the city is working on other affordable housing and rental home construction efforts. In collaboration and partnership with developers, we encourage new construction and the preservation of affordable rental units. The city provided gap funding using ARPA, HOME, and ERA2 reallocated funds.

Although it is hard to predict how many unhoused households will be assisted with rental assistance, it is expected that funding opportunities will be available during the program year through programs such as HOME-ARP and other leveraged funds.

AP-60 Public Housing – 91.220(h)

Introduction

Lucas Metropolitan Housing (LMH) will pursue the following strategies and related actions in the 2026-2027 Action Plan Year:

STRATEGIES:

Continue implementing its 2024-2028 strategic plan with the following goals:

- Invest in Employee Growth and Enhance Workplace Satisfaction;
- Increase Revenue and Pursue Diverse Income Streams;
- Lead in the Effort to Create Accessible Housing Opportunities in Toledo and the Region;
- Streamline Processes and Elevate User Experience and Satisfaction;
- Launch an inclusive Communication Strategy to Educate Stakeholders and Foster Community Awareness; and
- Build Pathways to Family Income Wealth Building and Economic Advancement.

In its efforts to create accessible housing opportunities in the region, LMH will:

- Continue to pursue opportunities to reposition its portfolio to create housing opportunities in existing high opportunity neighborhoods;
- Improve neighborhood conditions to create mixed income communities of choice; and
- Transition to more sustainable and diverse funding model to support ongoing capital and operational needs.

Actions planned during the next year to address the needs to public housing

LMH will continue to pursue opportunities to proceed with its portfolio repositioning strategy to maintain and modernize safe, accessible, affordable housing in the region. LMH will transform a portion of its Low-Income Public Housing portfolio using a sustainable subsidy platform available via HUD, all while keeping the units affordable at 30% AMI. It will renovate existing housing stock to address the unmet capital needs backlog and build new mixed-income communities of choice.

LMH will also expand its Energy Performance Contract by entering into a Phase II. In this phase, the savings generated in Phase I, combined with additional capital funds, will be reinvested in the Public Housing portfolio to modernize outdated mechanical systems, further improve energy performance, and increase curb appeal. This will be an investment of more than \$20 million into the Public Housing portfolio.

LMH will continue to expand the number of apartment homes available in the community through a combination of New Construction, Renovation, Acquisition, Project Based Vouchers, Project Based Rental Assistance, Housing Choice Vouchers, Capital Fund Program awards, Low-Income Housing Tax Credits and by leveraging Rental Assistance Demonstration (RAD).

- LMH intends to utilize its Faircloth limit to produce additional housing through the RAD program.
- Weiler Homes/Spieker Terrace is scheduled for pre-development work and design in 2026.

In 2025, LMH, with its non-profit affiliate & development arm, Lucas Housing Services Corporation (LHSC):

- Completed construction of Park Apartments and opened the doors to young adults 18-24 who were homeless with a disability. Park offers supportive services to provide support in the areas of mental health, job training and life skills.
- Moved towards construction completion of Collingwood Green Phase V, now known as Collingwood Green Living, a senior housing community. Scheduled to open in March 2026, 75 affordable one-bedroom units for seniors will come online.

LMH is committed to closing and beginning construction on the following projects in an effort to build new apartment homes for a variety of sub-populations of the region. Specifically, LMH will ensure the following developments are brought online as an accessible community resource:

- Mission Point – 65 apartments for chronically homeless - \$20 million investment.
- Palmer Gardens - 75 apartments - mixed income families - \$21 million investment.
- Thurgood Marshall – 54 apartments for Seniors - \$24 million investment.

Finally, LMH will continue to support its residents through a variety of different community partnerships, offering social services, benefits, case management, workforce development, and other opportunities to its residents. LMH will collaborate with local educational institutions and job training centers to provide residents with access to educational programs and vocational training that enhances their employability and economic advancement.

- LMH is collaborating with a group to create a Learning Center for cradle-to-career services in the Junction area.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

LMH will continue to operate and expand its Financial Opportunity Center to build families' and individuals' financial capability by offering them a suite of services, including:

- Employment assistance, financial education & coaching, and access to income supports.
- One-on-one coaching and education offered at trusted community-based organizations.

LMH will also leverage its Housing Choice Voucher Program to support families that are assisted under the housing choice voucher program to use their voucher to buy a home and receive monthly assistance in meeting homeownership expenses. All LMH homeownership and housing counseling will be completed by a HUD-certified counselor working for a HUD-approved housing counseling agency.

Through this work, LMH partners will:

- Increase the sources of financial assistance to families to make a home affordable and connect families to resources to meet down payment and closing costs.
- Build stronger community connections with financial institutions and provide more outreach and education to participants so that families can access the funding needed for a loan.
- Strengthen partnership with LMH's non-profit affiliate Lucas Housing Services Corporation to increase the offer of sustainable and affordable homeownership opportunities.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

Not Applicable. The PHA is not designated as troubled.

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

The Toledo Lucas County Homelessness Board (TLCHB), working alongside the Continuum of Care (CoC) partners, which include the City of Toledo, remains committed to coordinating local initiatives aimed at reducing and ultimately ending homelessness. Additionally, TLCHB and CoC partners have undertaken strategic planning to revitalize and strengthen the CoC, now rebranded as Home for Everyone, along with its governance structure and CoC Board. Home for Everyone encompasses traditional homeless and housing service providers, as well as partners from various provider systems impacting and serving homeless individuals, such as the Lucas County Board of Commissioners, the City of Toledo Department of Housing and Community Development, the United Way of Greater Toledo 2-1-1, local schools, the Mental Health and Recovery Services Board, Lucas County Children’s Services, physical health providers, mental health and Substance Use Disorder (SUD) providers, workforce providers, financial opportunity providers, etc. TLCHB and CoC partners plan to refine the structure and functionality of Home for Everyone, intensify its work, and formalize processes in 2025, inclusive of the alignment of strategic documents such as the CoC Written Standards, Coordinated Entry Referral Process, and Centralized Approach to Coordinated Access and Entry. These will strategically align with the HUD TA results and CoC committee-supported developments.

TLCHB and its partners will continue to improve Homeless Management Information System (HMIS) data quality and subsequent performance evaluation tools to evaluate community needs and gaps and position future funding priorities. An open HMIS system and revised coordinated entry system, including an assessment tool, will be integral to this effort.

TLCHB has established a strategic organizational partnership with the regional housing authority, Lucas Metropolitan Housing (LMH), to enhance the effectiveness of these efforts within the Toledo community. The collaboration between TLCHB and LMH has led to innovations in local homelessness service delivery. This model integrates best practices from the U.S. Department of Housing and Urban Development (HUD) into CoC services, focusing on housing populations prioritized by the strategic plan. This will allow for the use of 123 vouchers for Housing First and Moving On efforts. The CoC will develop a Moving-On policy for implementation with these vouchers.

TLCHB and partners will leverage these new and existing structures to successfully implement the Action Plan’s goals for homeless individuals and other special needs activities. TLCHB remains actively involved in supporting and advocating for agencies and organizations aiming to develop or acquire new supportive housing for populations experiencing chronic homelessness and/or more severe service needs, including Warren Commons, Park Apartments, and Mission Point.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

TLCHB and its CoC partners will persist in orchestrating community outreach initiatives tailored for individuals facing homelessness across various sectors, such as education, mental health, substance use disorder, physical health, criminal justice and corrections, social services, housing, the workforce, and financial opportunity providers. To ensure a consistent assessment within the Coordinated Entry system, there will be a focused collaboration with United Way of Greater Toledo's 2-1-1 to identify alternative assessment and prioritization opportunities. This will be accomplished through intensive HUD workshops and collaborative efforts with the CoC Board committees, inclusive of people with lived experience.

The CoC board aims to move from a closed to an open HMIS system before the 2026-2027 program year. Currently, providers may only see information in their programs unless a specific release is provided to view information in another program. An open HMIS system will, with participant consent, allow the service provider to see the history of services, the other agencies the client is working with at any given time, and historical services to help facilitate reconnection for support when applicable. Protections and specific provisions will be made for any protected health data. This will 1) increase data quality and minimize duplication of services; 2) improve service provision efficacy as staff will have reduced data entry time; and 3) reduce trauma amongst those requesting services by not having to share their information with multiple partners.

Furthermore, specialized case management services offered through the Projects for Assistance in Transition from Homelessness (PATH) program will be employed for individuals experiencing unsheltered and/or chronic homelessness. PATH's Community Outreach Specialists possess the expertise to identify and engage with unsheltered and chronically homeless individuals, linking them to necessary services and coordinating entry for housing alternatives. The PATH program also delivers intensive, client-centric, specialized case management services, resulting in enhanced outcomes for this population. In addition, the CoC seeks to enhance Coordinated Access by employing a Coordinated Entry Navigator that can be deployed to unsheltered individuals who may not fit the PATH client criteria.

The CoC is striving to increase coordination among community partners related to outreach and homelessness. The Encampment Engagement committee has created a unique communications thread to identify and provide services to individuals without shelter. TLCHB staff coordinate regularly with the PATH and HOPE outreach teams that are connected to people living on the street, as well as the Zepf youth outreach team. The TLCHB Coordinated Entry System Coordinator is the point person to communicate between these teams, the local police department, code enforcement, and park systems staff concerning local encampments and participant engagement. These groups will continue their

ongoing efforts to communicate and attempt to connect people with service and support in a respectful and dignified manner rather than just shutting down the encampment areas altogether.

Historically, the CoC has engaged in a summer PIT count. The CoC will strive to instead develop 2-3 smaller outreach events focused on encampment areas and/or specific populations to assess need and coordinate services. Heat mapping is another way the CoC is addressing the unsheltered population.

Addressing the emergency shelter and transitional housing needs of homeless persons

TLCHB and its Continuum of Care (CoC) partners will continue coordinating comprehensive community outreach initiatives for individuals experiencing homelessness across multiple systems, including education, mental health, substance use disorder treatment, physical health care, criminal justice and corrections, social services, housing, workforce development, and financial opportunity providers. To ensure consistent and equitable assessment within the Coordinated Entry (CE) system, TLCHB will collaborate closely with United Way of Greater Toledo's 2-1-1 to explore alternative assessment and prioritization approaches. This work will be supported through HUD technical assistance workshops and coordinated efforts with CoC Board committees, including the meaningful involvement of individuals with lived experience.

In advance of the 2026–2027 program year, the CoC Board intends to transition from a closed to an open HMIS system. Currently, providers can only view information within their own programs unless a specific release is obtained. Under the open HMIS model, and with participant consent and appropriate protections for protected health information, providers will be able to access a participant's service history, current agency engagements, and prior housing interventions. This change is expected to increase data quality, reduce duplication of services, improve staff efficiency by decreasing duplicative data entry, and minimize trauma for participants who otherwise must repeatedly share their information with multiple providers.

Specialized outreach and case management services will continue through the Projects for Assistance in Transition from Homelessness (PATH) program, which focuses on individuals experiencing unsheltered and/or chronic homelessness. PATH Community Outreach Specialists are trained to identify and engage unsheltered individuals, connect them to necessary services, and coordinate access to housing alternatives while providing intensive, person-centered case management to improve outcomes. To further enhance Coordinated Access, the CoC will deploy a Coordinated Entry Navigator to engage unsheltered individuals who may not meet PATH eligibility criteria, ensuring broader system coverage.

The CoC is also strengthening coordination among outreach partners. The Encampment Engagement Committee has established a dedicated communication thread to identify and respond to the needs of individuals residing in encampments. TLCHB staff regularly coordinate with PATH, HOPE outreach teams serving individuals living outdoors, and the Zepf youth outreach team. The TLCHB Coordinated Entry System Coordinator serves as the primary liaison among outreach teams, local law enforcement, code

enforcement, and park systems staff to ensure coordinated, respectful engagement strategies that prioritize connection to services rather than displacement.

Historically, the CoC has conducted a summer Point-in-Time (PIT) count; however, moving forward, the CoC plans to implement two to three targeted outreach events focused on encampment areas and specific populations to better assess needs and coordinate services. Additionally, heat mapping strategies will be utilized to identify trends and geographic concentrations of unsheltered homelessness, allowing for more strategic and responsive outreach efforts.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The CoC is transitioning to an open HMIS system (vs. a closed system) and implementing a new assessment tool for use in Coordinated Entry (CE). The anticipated outcomes of this change will be to shorten the length of time spent being homeless due to greater access to information. While the tool may change, the process of including both the use of an assessment tool and case conferencing will be utilized by TLCHB and CoC partners to optimize program placement to meet household needs and shorten the time individuals and families experience homelessness and get sheltered or into housing options. TLCHB and CoC partners will give special assistance to chronically homeless people and families, families with children, veterans and their families, and unaccompanied minors.

With TLCHB's partnership with LMH, the CoC will provide stronger service coordination in referrals to affordable housing, housing support, and long-term housing assistance such as tenant- and project-based vouchers.

Chronically homeless people will have greater options to discover their path to being homed and the support services that can accompany their placement to meet the specific adjustments to being homed, such as mental health and substance use needs, location, workforce development opportunities, and support such as transportation options or daycare.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

The continuation and expansion of Housing Problem Solving activities at the front end of Coordinated Entry through United Way 2-1-1 will address households at greatest risk of becoming homeless by diverting people from traditional CE resources through problem-solving conversations, referrals to community resources, and the limited use of flexible financial assistance to overcome one-time barriers.

St. Paul's Community Center's (SPCC) Organizational Representative Payee program is one effective tool that Toledo uses to help prevent homelessness with individuals who receive Social Security benefits. Individuals who have been deemed by a physician to be incapable of managing their benefits are assigned a payee to assist with paying rent and budgeting the benefits for the individual. SPCCs long history of providing a last resort payee for individuals has helped to keep more than 600 individuals per year from becoming unhoused.

Discussion

During the 2026–2027 program year, TLCHB and its Continuum of Care partners will strengthen data quality and system integration through enhancements to HMIS and coordinated entry processes. Improved data collection, transparency, and performance evaluation tools will allow the community to better assess service gaps, housing outcomes, and trends among persons experiencing homelessness and other special needs populations. These data-driven insights will inform funding priorities, resource allocation decisions, and strategic investments to ensure programs are aligned with demonstrated needs and measurable outcomes.

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

Historically, jurisdictions that receive federal dollars, directly or indirectly, have been required by the Department of Housing and Urban Development (HUD) to complete an Analysis of Impediments to Fair Housing Choice (AI). The AI process is prescribed and monitored by HUD and the State of Ohio's Department of Development. Specifically, to receive HUD Community Planning and Development formula grants, a jurisdiction was required to (i) certify its commitment to actively further fair housing choice; (ii) maintain fair housing records; and (iii) conduct an Analysis of Impediments to Fair Housing Choice. With the recent decision by HUD Secretary Scott Turner to terminate the AFFH Rule in February 2025, entitlement communities are no longer required to complete an AI. Rather, the city can certify that it has affirmatively furthered fair housing, in accordance with the Fair Housing Act.

Regardless, the City of Toledo contracted with the Toledo Fair Housing Center to develop an AI, which was completed as the Consolidated Plan was developed. The AI reviews barriers that inhibit residents from acquiring the housing of their choice based on federal, state, and local characteristics: race, color, national origin, religion, sex, familial status, disability, military status, sexual orientation, gender identity, immigration status, and source of income. The examination looks at issues in our community through a fair housing lens, including community characteristics and demographics; income and poverty; transportation; employment; and public and private policies that impact protected groups and vulnerable populations, such as zoning, code enforcement, and real estate practices, among others.

Emerging, persisting, and worsening impediments discussed in this document include the continuing effects of redlining and other forms of systemic discrimination; the indicators of low opportunity and health risks in neighborhoods of color; and the corresponding lack of housing mobility among occupants in neighborhoods of color. Other significant housing concerns are also illustrated, such as lead hazards, barriers faced by persons re-entering the community after incarceration, and the emerging issue of discrimination based on source of income. The text also calls for affirmative programming and counseling to improve and inform housing choices and highlights the need for legislative changes to ensure the effectiveness of this programming.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

Recognizing that barriers to fair housing can be synonymous with barriers to affordable housing, The Fair Housing Center (TFHC), in partnership with the City, completed an Analysis of Impediments (AI) and developed action steps for the removal of fair housing obstacles within the Fair Housing Action Plan. The City of Toledo's 2025–2030 Analysis of Impediments and Fair Housing Action Plan outline a comprehensive set of strategies to remove or mitigate barriers to affordable housing.

In January of 2025, the City of Toledo was awarded \$4 million through the Pathways to Removing Obstacles to Housing (PRO Housing) program, in partnership with the Lucas County Land Bank and the Toledo-Lucas County Plan Commissions. The funding will address two significant barriers to affordable housing production and preservation in the City of Toledo: an outdated zoning code and a weak market for new or preserved housing. Toledo will use this funding to assist in ameliorating affordable housing production in the following ways:

- Comprehensive update of the Toledo Planning and Zoning Code and development standards;
- Reducing costs for new affordable housing production by developing and approving housing design templates to be made available to housing developers; and
- Appraisal gap financing to incentivize housing production in targeted weak market neighborhoods, including the Geographic Target Areas of the Consolidated Plan.

As part of the PRO Housing award, the City of Toledo Plan Commission will complete a comprehensive zoning code rewrite, reducing barriers to housing production and allowing for missing middle housing types. The Plan Commission has also removed the minimum lot size for buildable lots, eliminated parking minimums, and is allowing higher-density residential zoning. The City's Department of Building Inspection and DHCD have joined a consortium of cities starting a Pre-Approved Plans Program, which will reduce planning costs, permit fees, and time for plan approval. Building Inspection also launched the Permit Planner portal in 2022 and allowed for online application filings in 2024.

The Residential Tax Abatement (RTA) program is designed to spur housing development and rejuvenate existing housing stock within city limits. This program offers a 100% exemption on the increased property value resulting from new home construction or significant renovations. The abatement period extends up to 12 years for renovations and up to 15 years for new construction. DHCD operates the Home At Last (HAL) homeownership assistance program, which offers homeownership assistance for eligible first-time home buyers below 80% AMI. Homebuyers are eligible for up to \$12,500 to use toward the purchase of a home and up to \$20,000 in the NRSA neighborhoods.

The Lucas County Land Bank operates the city's land bank program as authorized by city ordinance. The Land Bank operates several programs to reduce barriers, including the Adopt A Lot, Farm A Lot, and other programs for building new homes on available vacant lots and renovating existing homes in a fair, affordable way. The Adopt A Lot program reduces vacant, unused land to the benefit of the neighborhood.

These strategic actions aim to promote housing equity, dismantle systemic barriers, and ensure fair access to housing across Toledo, especially for vulnerable and historically marginalized communities. Let me know if you'd like a formatted table or visual summary of these points.

Discussion:

The City of Toledo has adopted local source of income discrimination laws and other measures in its local anti-discrimination law. However, currently, this law is not being enforced. It is important that the city develop systems and processes to pursue enforcement of this local law. This should include amending local laws further as may be necessary to facilitate this process.

Toledo currently employs significant restrictions on group homes for persons with disabilities, which invokes outdated and offensive terminology. The Ability Center, The Fair Housing Center, and the Mental Health and Recovery Services Board asked that the city update its zoning code to comply with fair housing laws and to better serve persons with disabilities. In 2022, the city did consider a potential change to the zoning code after a study conducted by the Plan Commission; however, this process did not result in an appropriate policy change and did not change the zoning code. City Council did not proceed with a vote on the law and the outdated zoning laws remain.

Also related to zoning, the AI strongly suggests that the city pay close attention to the development of plans created by local residents to ensure that neighborhood development occurs in a manner with which they are comfortable. As the city works on the development of its neighborhoods, it should be mindful of this issue. The city's zoning officials, for example, should ensure that developments are consistent with adopted neighborhood plans.

Enforcement of the City of Toledo's local lead poisoning prevention law remains an extremely important barrier to fair housing choice. Housing conditions are identified as an important impediment to fair housing choice in Toledo. The city should ensure that an appropriate level of resources and staffing is dedicated to the implementation of the law, and this should be monitored closely.

AP-85 Other Actions – 91.220(k)

Introduction:

The City of Toledo is dedicated to fulfilling the needs of the underserved through program management and partnerships with community organizations. The city wants to help the underserved by building and preserving affordable housing, minimizing lead-based paint dangers, and reducing the number of families living in poverty through services provided by community partners and other local groups.

The city continues to explore ways to form alliances and partnerships with all sectors of the local community. The DHCD improves understanding of community agencies and resources through mandatory quarterly trainings for CDBG and ESG-funded agencies. Speakers from neighborhood organizations are also invited to address the city's partners, sharing their knowledge and experiences. Networking and information exchange are encouraged to improve community service coordination.

While the city originally had numerous Community Development Corporations, these organizations have now closed. There are strong neighborhood-based community agencies and associations that typically operate independently; however, they could be important partners in a broad-based catalyzing collective impact effort in various neighborhoods throughout the city, including the specific geographic target areas of Englewood NRSA, Junction Choice Neighborhood NRSA, Old South End NRSA, and Vistula Neighborhood. The city is interested in exploring collective impact models more fully and identifying a specific effort that may serve as a pilot model that is rooted in the collective efforts of a network of locally based community organizations working together to maximize the impact of the investment in a neighborhood.

Actions planned to address obstacles to meeting underserved needs

The City of Toledo, like other communities across the country, faces challenges with a strong contractor pool to meet the needs of its construction and rehabilitation pipeline funded with CDBG and HOME. This is especially true for owner-occupied rehabilitation activities.

There is an ongoing effort to expand the contractor pool and partner with other local agencies to deliver expedited assistance to LMI households. This includes an open bid process and the publication of contractor opportunities with the COT via local publications and social media. Engagement with local contractors has been a priority for the Department of Housing and Community Development as well. The awarding of tax credits from the Ohio Housing Finance Agency (OHFA) to developers building in Toledo, Lucas County, has been a challenge due to the lack of awards provided to inner-city development in Toledo. A HOME-ARP NOFA for Affordable Rental and Supportive Housing was issued July 2024. This is in hopes that a potential applicant will be successful in securing tax credits. The developers will be granted an extension if needed to allow them additional time to reapply for the 4% tax credit pool. The COT will engage with OHFA to discuss a scoring mechanism that is more equitable

when considering mid-sized cities in Ohio.

Through collaboration with The Fair Housing Center (TFHC), a 2025 Analysis of Impediments (AI) to Fair Housing Choice was completed, as discussed in Sections SP-55 and AP-75. The AI's Fair Housing Plan outlines actions that will be taken to remove barriers to fair housing. The COT and TFHC will work together, in conjunction with other local partners, to carry out the actions indicated in the Fair Housing Plan.

Actions planned to foster and maintain affordable housing

The city will use various initiatives, as well as funds from the HOME, HOME-ARP, ARPA, ERA, and CDBG programs, to maintain and foster affordable housing. The goals identified in the Strategic Plan and the Action Plan include the construction and acquisition of affordable homes, rehabilitation of existing housing stock, home-buyer assistance, home repair programs for the elderly and disabled, emergency rental assistance, and housing services for non-homeless special needs populations. The goals of the Annual Action Plan also included funding to increase the capacity of local non-profit community development corporations to develop affordable housing and/or attract larger for-profit developers to develop low-income housing tax credit rental units.

The city will continue to work with partners and policymakers to increase rental housing through HOME-ARP funding by providing GAP financing for 9% and 4% tax credits. The COT engaged Root Policy to develop the HOME-ARP Allocation Plan, which included contributions from key stakeholders in the city and county. The COT has continued these efforts to set forth in its HOME-ARP Allocation Plan to seek out qualified projects. In accordance with Notice CPD 21-10, the Draft Substantial Amendment to the HOME-ARP Allocation Plan was placed on public display for a period of 15 days beginning January 26, 2026 and ending February 9, 2026. The deployment of the HOME-ARP funds will continue to support one of the housing strategy goals, which is to increase access to affordable housing opportunities within the city via new construction and/or rehabilitation of single- and multi-family units.

Also, the COT remains an active member of the Year 16 Initiative, which seeks to preserve the affordability of over 700 single-family low-income housing tax credit-financed units, working along with local PHAs, lenders, and intermediaries. The COT plans to work with a local university to determine the level of foreclosures, including foreclosed homes and those at risk of foreclosure. The data will be used to determine the need for a foreclosure counseling program during the Consolidated Plan period.

The COT is allocating funds for affordable rental housing development in conjunction with developers to encourage new construction and the preservation of affordable rental units in existing NRSAs and around the city. The HOME-ARP Allocation Plan and a number of other initiatives are used to promote and sustain affordable housing in Toledo.

Actions planned to reduce lead-based paint hazards

The COT continues its commitment to providing lead-safe, decent, safe, and sanitary housing for eligible families. This effort uses a highly coordinated network consisting of private health officials, community development corporations, the local public housing authority, social service agencies, and other city departments. The effort targets central city neighborhoods, where low-income families occupy approximately two of every three residential units, and the concentration of pre-1978 structures containing lead paint is estimated to exceed 80 percent.

Toledo has conducted lead clearance work for over 30 years, beginning with its first Lead Hazard Control grant in 1995. The city leverages funding from HUD, Ohio Department of Development, and Lucas County Regional Health Department EPA settlement funds. Funded activities include but are not limited to: education, training, inspections, risk assessments, lead hazard control/abatement, and lead clearances.

Current Active Grants:

- HUD OHLHD0575-25: awarded 12/11/2025, 48-month period of performance beginning 03/02/2026
- Ohio Department of Development: Ends 6/30/2026 (30–60-day close-out)
- Lucas County EPA settlement funds: Ends 3/25/2027

Lead-based paint hazard control methods for all of the DHCD's lead programs include the utilization of low-level interventions, interim controls, and partial component abatement. Abatement is the DHCD's preferred method for addressing painted surfaces. The program does not perform full abatement but rather replaces specific components and systems. Units are made lead-safe but not lead-free.

DHCD and Lucas County Regional Health Department maintain a local lead-safe registry at toledoleadsafe.com, featuring rental units with Lead Safe Certificates per the City's Lead Safe Ordinance. Owner-occupied units are excluded from the registry as they do not require certification.

The City updated its Lead Safe Ordinance as of April 22, 2025 and it is currently being implemented for phased enforcement based on a schedule of priority Census Tracts. Property owners are being notified in accordance with this schedule. Once the first compliance deadline passes, enforcement actions will begin for properties that have not yet met the lead-safe certification requirements as outlined in the ordinance.

The administrative, review and enforcement functions of the ordinance were transitioned to the City of Toledo as of September 19, 2025. The City's communications plan involves direct mailing to property owners, billboards, radio ads, and print advertisements running across the city to raise awareness and to facilitate compliance.

Actions planned to reduce the number of poverty-level families

The Consolidated Plan's and this Action Plan's objectives are to decrease Toledo's population of low-income individuals or families. Low-income residents and families can access housing and community development initiatives through the Department of Housing and Community Development. Housing programs aim to provide the following benefits to households: economic development, family stability, health improvement, homeownership, and community development.

Actions planned to develop institutional structure

The DHCD recognizes the necessity of maintaining a high level of cooperation while working on projects with other City departments and/or groups. While DHCD administers all aspects of the HUD grant programs, high-quality collaboration ensures the greatest possible results and the most efficient use of resources. The city will continue to coordinate activities with partners such as:

- Toledo Lucas County Homelessness Board (TLCHB)
- Toledo - Lucas County Plan Commissions
- United Way of Greater Toledo
- Lucas Metropolitan Housing (LMH)
- Mental Health and Recovery Services Board of Lucas County
- Lucas County Board of Developmental Disabilities
- Ohio Means Jobs/Lucas County
- Lucas County Land Reutilization Corporation (Land Bank)
- Toledo - Lucas County Health Department
- Toledo - Lucas County Port Authority

Each of Toledo's partners brings a unique service element and level of expertise. To achieve the desired community outcomes, it is essential to maintain these partnerships and collaborations. There are numerous connections between the corporate community, religious institutions, government agencies, housing providers, foundations, and other neighborhood groups that support the underprivileged. There will be more communication with all community stakeholders.

Actions planned to enhance coordination between public and private housing and social service agencies

The city will continue to collaborate with a diverse range of governmental, private, faith-based, and community organizations to assess the needs of its residents. The city will continue to collaborate with the CoC and the community to streamline public service agency actions and improve the lives of all Toledo residents. These organizations handle a wide range of family issues, including homelessness, workforce development, and community health.

Discussion:

The city will continue to seek broad and comprehensive solutions to the community and economic development concerns it faces. It presents both obstacles and opportunities, which the CDBG, HOME, and ESG funds can influence and effect. Because these funds may be used in such a variety of ways to address complex, multiple community concerns, they continue to be an important instrument for the city in attaining a lively, stable, and diverse quality of life for its inhabitants. The city's most major difficulty, however, is a lack of resources to effectively address the need.

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

Introduction:

The COT uses CDBG and HOME funds in support of a variety of housing and community development needs and services. ESG is used for shelter operations, homelessness prevention, and rapid rehousing. This section shows information on program specific requirements for the Community Development Block Grant, HOME and Emergency Solutions Grant (ESG) programs.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	0

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	0.00%

**HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.220(I)(2)**

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

The COT does not utilize any other forms of investment other than those noted in CFR 92.205.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

Recapture Provision

The COT uses the Recapture Provision to ensure affordability for all homebuyer programs when a Direct Subsidy is provided to the homebuyer to purchase the property. A Direct Subsidy includes a down payment, closing costs, and other assistance to the homebuyer that reduces the purchase price from the fair market value to an affordable price.

If the homebuyer desires to sell the house and notifies the City within the affordability period, based on the Direct Subsidy provided to the homebuyer, the City will use recapture provisions to mitigate noncompliance based on the prorated recapture formula below. The amount recaptured by the city cannot exceed what is available from net proceeds. Net proceeds are defined as the sales price minus superior loan repayments (other than HOME funds) and any closing costs.

Recapture Formula

To determine the pro-rata amount recaptured by the city:

- Divide the number of months the homebuyer occupied the home by the affordability period (in months), and;
- Multiply the resulting figure by the total amount of direct HOME subsidy originally provided to the homebuyer.

NOTE: Development Gap Subsidies (i.e., the difference between the cost of producing the unit and the fair market value of the unit) are not subject to recapture as the homebuyer does not realize a direct benefit from these funds.

Resale Provision

For properties that receive HOME development subsidies only, and there is no Direct Assistance to the homebuyer, the resale requirements below will apply if the home is sold during the affordability period:

- The new purchaser must be a low-income household with income at or below 80% AMI.
- The household income must be verified by the city. Income verification process and

- contact information is included in the Homebuyer Written Agreement.
- The property must be the family's principal residence and the new purchaser agrees to assume the remainder of the original affordability period.
 - Fair return will be measured by the percentage change in the Consumer Price Index over the ownership period.
 - The original homebuyer, now the home seller, must receive a "Fair Return" on investment, as defined by the city.
 - The basis for calculating fair return will include a return on 1) the HOME-assisted buyer's original investment, plus 2) capital improvements made by the original buyer based on actual costs of improvements as documented by homeowner's receipts.
 - The improvements include window and roof replacements; electrical and plumbing system upgrades; infrastructure improvements; kitchen and bathroom remodels; basement finishing and energy efficient upgrades.
 - In some instances, it may be necessary for the city to provide HOME assistance to the subsequent purchaser to ensure that the original buyer receives a fair return and the unit is affordable to the low-income population, as defined.
 - The Homebuyer Agreement must also include a provision of first right of refusal for the City to purchase the affordable unit if an eligible buyer cannot be found in a reasonable time frame.

To maintain the continued affordability of the property throughout its affordability period, the City will ensure the home is affordable to LMI homebuyers at the time of resale. The targeted population of such buyers will include households with incomes of 60%-80% AMI paying no more than 30% of gross income for principal, interest, property taxes, homeownership association dues, and insurance. If the price that provides a fair return to the initial homebuyer is too high to be affordable for the subsequent LMI buyer to purchase the property, the City at its sole discretion, may provide HOME assistance as a direct subsidy to the subsequent buyer, thereby imposing a new affordability period and subjecting the assistance to the recapture provision.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:
 - The City enforces the recapture provision with a Homebuyer Agreement and Restrictive Covenant recorded in the land records of the City of Toledo.
 - The City enforces the resale provision with a Homebuyer Agreement and Restrictive Covenant recorded in the land records of the City of Toledo.

Foreclosure

As provided in 24 CFR Part 92.254(a)(5)(i)(A), "affordability restrictions may terminate upon occurrence of any of the following termination events: foreclosure, transfer in lieu of foreclosure or assignment of an FHA insured mortgage to HUD. The City may use purchase options, rights of first refusal or other preemptive rights to purchase the housing before foreclosure to preserve

affordability. The affordability restrictions shall be revived according to the original terms if, during the original affordability period, the owner of record before the termination event, obtains an ownership interest in the housing."

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

HOME funds will not be used to refinance existing debt secured by multifamily housing.

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).

Not Applicable

6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).

Not Applicable

7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

For HOME-ARP, applicants will be placed on a waiting list (Qualifying Population 1): Homeless (1), (2), (3) is the Preference) and the others will be based on chronological order of completed submission.

**Emergency Solutions Grant (ESG)
Reference 91.220(l)(4)**

1. Include written standards for providing ESG assistance (may include as attachment)

Written standards are contained within the four documents listed below:

- OH-501 Toledo/Lucas County CoC Written Standards for Service Delivery
- HMIS Consolidated Policies
- Coordinated Entry Referral Process
- Collaborative Governance of Coordinated Assessment
- Centralized Approach to Coordinated Access/Entry

See ESG Attachments for these documents.

With the anticipated 2026 CoC NOFO, it is expected that these documents will have approvals on updates before the 2026-2027 program year. The collaborative governance for coordinated assessment and centralized approach to Coordinated Access/Entry were revised and implemented in December 2025. Key performance indicators, HMIS Consolidated Policies, and the Coordinated Entry referral process will be reviewed and voted on in February 2026. The updated policies will be adopted as of March 1, 2026, and fully implemented by June 2026.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

The CoC has established, implemented, and consistently follows a Coordinated Entry System (CES) to ensure prioritized access to available resources within the local homelessness crisis response system. This system enables CoC partners to make fair and consistent decisions, connecting individuals with interventions to swiftly end their homeless episode. People at risk or experiencing homelessness can access the CES through various pathways, ultimately leading them to a centralized access point for screening, diversion, referrals to temporary shelter, and housing assessments. While United Way 2-1-1 acts as the main access point, the local, Substance Abuse and Mental Health Services Administration (SAMHSA) funded PATH Team conducts outreach for unsheltered individuals and connects them to 211.

Once a household with housing instability has cleared the initial screening for safety concerns, the call is elevated to Coordinated Access (CA) specialists for Housing Problem Solving for diversion and homelessness prevention components. The 211 CA staff are trained to administer the housing prioritization assessment. Households are then referred to available emergency shelter or housing navigation providers. Households remain in the Coordinated Access program until a solution is determined.

All screening questions include culturally and linguistically competent questions to reduce cultural and linguistic barriers to housing and services for special populations. Coordinated Access specialists maintain a waitlist and, at the time of a bed opening, use the order of priority from the housing prioritization assessment to offer shelter or other available options. The Coordinated Access portion of the Coordinated Entry System covers 100% of the CoC geographic area in Lucas County plus Wood and Ottawa Counties.

The CoC uses a prioritization assessment tool (PAT) to determine housing assistance levels. The PAT is completed with the household by a case manager, coordinated access specialist, or other professional trained by the CoC. The PAT produces a standardized score that correlates to a referral for housing programs. Client choice and feedback from case management can also be considered to ensure all referrals are person-centered.

All community assessment scores and information are given to TLCHB's Coordinated Entry System Coordinator to be compiled into a common Community Eligibility Pool. The Coordinated Entry System Coordinator focuses on speedy referrals to housing programs through eligibility pool meetings and voucher applications. Biweekly eligibility pool meetings occur with case managers and housing providers to determine placement and provide a warm handoff to the housing provider.

Within the CoC, there are a range of housing programs available to persons experiencing homelessness: Rapid Rehousing, Supportive Housing, Transitional Housing, Group Homes, Public Housing Vouchers, and private landlord leases. The CoC honors participant choice in its housing referrals and seeks to work with the lowest-barrier housing providers and landlords available to decrease the amount of time a household experiences homelessness.

The Home for Everyone (HFE) Continuum of Care (CoC) utilizes committees responsible for providing feedback on the Coordinated Entry System (CES) and developing strategies for improvement. The HFE CoC has reconstructed the CES with feedback from people with lived experience and by recommendations made by C4 consultants during the 2024 CES Evaluation. A new prioritization assessment, a move to Open HMIS, and common language were the three main focuses of the CES improvement plan. The CoC seeks to increase outreach activities for the increasing unsheltered population during the 2026-2027 program year.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

The TLCHB, in partnership with the DHCD, engages the following process:

- Policies and procedures for the local application process are established, including general instructions, a local competition timeline, threshold criteria, application questions, and scoring criteria or points available for each section of the application. Additionally, the local application requires that each applicant certify that the

organization will incorporate person-centered principles, participate in HMIS, and fully participate in the Coordinated Entry System.

- A mandatory application training session is held prior to application release. The meeting is widely publicized, including postings on the TLCHB website and social media pages and direct invitations to current grantees and providers within the Home for Everyone CoC membership.
- A Citizens Review Committee (CRC) comprised of community representatives is identified, recruited, trained, and engaged in determining application priorities, processes, scoring, and selection.
- Completed applications are submitted within a specific timeframe and are reviewed, ranked, and recommended (or not) for funding by the CRC. Applicants engage the CRC in an in-person interview by providing a 10-minute presentation of funded programs to the CRC and answering any relevant questions about their request(s) for funds.
- The CRC votes on funding recommendations to be submitted to the DHCD for final selection and recommendations to the Mayor of Toledo and the City Council.
- DHCD notifies agencies of funded program(s).
- TLCHB monitors agency programs for grant compliance and reports to DHCD.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

A written obligation within third-party contracts with TLCHB and the DHCD provides guidance to achieve this expectation and is monitored by both TLCHB and the DHCD. ESG-funded agencies are required to have a formerly homeless representative on their boards. TLCHB will meet this obligation through a board appointment from the City of Toledo. Recommendations and/or nominations from the constituency are preferred. Five (5) seats on the CoC HFE Board are specifically designated for people with lived experience, including two (2) youth representatives age 18-24.

The Community subcommittee of the No Barriers Housing Committee for the HFE CoC facilitates focus groups to engage people with lived experience and to gain a better understanding of the homeless community's perspectives on homeless services in Lucas County. The Youth Advisory Board (YAB) also meets monthly to provide guidance on services for individuals 18-24 years old. In 2026, the YAB will participate in both a local and statewide system mapping of youth programs.

5. Describe performance standards for evaluating ESG.

In September 2022, the local Continuum of Care (CoC) introduced updated performance standards for agencies receiving funding. Not all program types have suggested targets for every performance indicator; some have specific targets for special populations, either in lieu of or in addition to overall

targets. This aligns with HUD's Interim Rule, which emphasizes "performance targets appropriate for the population and program type." Target indicators are categorized based on the National Alliance to End Homelessness Rapid Re-Housing Triage Tool, which assesses three areas of housing barriers. The Key Performance Indicator list outlines recommended targets for each program type and indicator.

These performance indicators remain consistent across all funding sources. The standards set by the TLCHB for emergency shelter, transitional housing, prevention, and rapid re-housing activities are applicable to the evaluation of ESG activities. These measures are evaluated by TLCHB during monitoring visits, and snapshots of performance are provided to the DHCD quarterly. Annualized snapshots are given to the CRC for review during new application funding processes.

In the Integrated Disbursement and Information System (IDIS), HUD's computerized reporting system, the performance objectives and outcomes are predetermined based on the activity type or category. Each category has subcategories in IDIS. The grantee may not choose their performance objectives and outcomes; applicable objectives and outcomes as established in IDIS are as follows:

HESG Activity Category	Performance Objective	Performance Outcomes
Prevention	Provide Decent Affordable Housing	Affordability
HMIS	N/A	N/A
Rapid Re-Housing	Provide Decent Affordable Housing	Affordability
Administration	N/A	N/A
Shelter	Create Suitable Living Environment	Availability/Accessibility

The city is not funding street outreach or supportive housing activities through its ESG funds. Please refer to AP-65 of this Action Plan for existing outreach, supportive housing, and assessment activities in the city within the CoC.

In November 2025, HUD released a since-rescinded Notice of Funding Opportunity (NOFO) that outlined major changes to program outcomes. Once HUD decides how the NOFO will be reissued and presented, key performance indicators will change. The CoC System Performance Committee intends to have updated Key Performance Indicators in place before June 2026. Indicators related to income, workforce development, and program requirements are anticipated to be the indicators most affected by the updates. Indicators for Prevention, Outreach, and Supportive Services only will be added for the 2026 program year.